

Name: Williams, Phil

Date: Jan. 22, 2013

City: Edmonds

Part: Rail

Human environment: Noise, Human health, Traffic or safety, Other human environment topic

EIS process: Area of potential effect, Other EIS process topic

Comment:

I am the Public Works and Utilities Director for the City of Edmonds. I am submitting the following information and requests electronically on behalf of the City. The letter has also be mailed to the address specified.

January 18th, 2013

To: Co-lead agencies for the subject EIS
GPT/BNSF Custer Spur EIS Co-Lead Agencies
c/o CH2M HILL
1100 112th Avenue NE, Suite 400
Bellevue, WA 98004

Alice Kelly
Northwest Regional Office, Department of Ecology

Randel Perry
U.S. Army Corps of Engineers, Regulatory Branch
Northwest Field Office

Tyler Schroeder
Planning and Development Services, Whatcom County
RE: GPT/BNSF Custer Spur EIS
From: City of Edmonds
Subject: Comments regarding scoping

The City of Edmonds wishes to provide comment regarding the scope of the subject EIS being prepared by the Department of Ecology (Ecology), the U.S. Army Corps of Engineers (USACOE), and Whatcom County as co-lead agencies.

Edmonds City Council adopted resolution No. 1280 on July 13th, 2012 expressing significant concerns about the potential for increased rail traffic related to the Gateway Pacific Terminal proposed by SSA Marine for Cherry Point in Whatcom County. A copy of that resolution is attached. We ask that it specifically be made a part of the scoping summary report.

Edmonds has 4 ½ miles of shoreline on Puget Sound. Throughout that distance BNSF operates either a single rail line or a double track system. BNSF is in the process of converting their entire frontage in Edmonds to a double track system but the timing of that project has not been released by BNSF. It would appear, based on information made available to date, that virtually all freight destined for shipment from this proposed terminal would pass through Edmonds on existing BNSF rail lines. This trackage currently handles an average of 45 trains each day, including both freight and passenger trains. Each movement through Edmonds blocks both Dayton and Main streets either in sequence (passenger trains) or simultaneously (freight trains). This existing level of train traffic already creates a number of significant issues for our citizens and visitors.

Emergency Response

When a train passes one of Edmonds' at-grade crossings emergency vehicles must wait for it to clear before a response can be made. This includes law enforcement, fire suppression, and paramedic/ambulance services. The portion of Edmonds cut-off by passing trains includes the Edmonds Senior Center, two City parks, a nationally known dive park, four restaurants, the Port of Edmonds with 897 slips, a busy Dog Park, a sizeable office building, and residential condominiums. Accounting for the average speed of freight and passenger trains through Edmonds and their respective average lengths, this creates a total of approximately 4 ½ hours of blockage each day with more than 90% of that from freight trains. That is 4 ½ hours each day where emergency responders can't get to those who need their services. This is the current situation. Any further reduction in response times would be unacceptable. Train traffic is estimated to grow from 45 trains per day (TPD) to 70 TPD by 2020 and 104 TPD by 2030. The 9-18 coal trains necessary to supply the proposed terminal analyzed by this EIS is the single biggest, identifiable block of new rail traffic being proposed. Now is the time to analyze the impacts of rail traffic growth on Cities that host BNSF rail lines. There may never be another opportunity to do so. Train traffic is likely to grow slowly over time to the levels cited above. It is quite possible we won't see another major EIS on a new facility as dependent on rail as this one is. The EIS

process for this project needs to thoroughly evaluate the environmental, social, economic, and transportation impacts that are clearly foreseeable when looked at as part of the underlying growth of rail traffic in Washington State. This is an issue of public safety for the City of Edmonds and several other cities in our state.

Edmonds requests the scope of the EIS include a detailed study of the baseline interference to traffic patterns between trains and vehicle traffic at both Dayton and Main streets and then project the change in those patterns out to the year 2030, including, but not limited to, projected coal train traffic. The study should identify possible alternatives to resolving these conflicts which can be analyzed as possible mitigation for this project.

Ferry Traffic Interruption

Edmonds hosts the only remaining location where ferry loading and unloading operations are at grade over BNSF rail lines. This results in significant and increasing delays to all modes of travel. With train traffic increasing over time this problem will become only more acute. The Edmonds/Kingston route carries more vehicle traffic than any other route in the Washington State ferry system (2010/2011 totals). It also carries nearly 4 million passengers each year, second only to the Bainbridge Island crossing. This connection is a critical part of the Puget Sound transportation network for commuting, tourism, and freight. The additional delays inherent to increased rail traffic, particularly by long, relatively slow coal trains, will be considerable. Unmitigated, these delays could begin to impact ferry schedules and capacity. The volume of both passengers and vehicles choosing to use the ferry system could be reduced as a result. This would reduce revenues to the system and place more vehicles on our busy highways. There is also an issue of safety at these two crossings. Edmonds has experienced two train/vehicle accidents in the last three months, one where a passenger train struck a very large semi-tractor trailer at Main Street illustrating the significant safety concerns at this location. This issue needs additional and detailed analysis leading to specific proposals to eliminate this at-grade conflict. The EIS should study these interferences with Ferry system operations and make reliable projections based on expected conditions out to 2030. This information can be used in conversations regarding mitigation should the project continue to move forward.

Noise

The 45 trains that come through Edmonds each day blow their whistle at each of our two crossings. That is a total of eight for each train or 360 high-intensity blasts every 24 hours which could rise to over 800 in the future. These horns are required by the FRA to put out a minimum sound pressure level of 96 dBA and a maximum of 110 dBA at a 100 foot distance in front of the train. This is occurring in an area where over two million cars and four million people transit, many of them twice each day. The most acute exposures are likely to be to walk-on ferry riders, people waiting for a Sounder or Amtrak train, and citizens trying to enjoy the public amenities at Edmonds' waterfront parks. These noise levels are well above levels that can cause hearing loss to those not wearing hearing protection. It is also loud enough, according to available research, to cause significant interruption to normal conversation as much as a mile and a half from the track. No comprehensive study has been conducted in Edmonds that measures the sound level and impacts of train whistles on hearing loss, sleep patterns, real estate prices, or stress levels. Such a study should be completed that is Edmonds-specific and projects to 2030 train traffic levels so that noise abatement strategies can be discussed intelligently during deliberations about mitigation. In the alternative, project proponents should commit to the establishment of a complete "Quiet Zone" for downtown Edmonds two crossings that incorporates all of the available strategies to enhance pedestrian and vehicle safety while eliminating the need for train whistles.

PDF Attachment:  [Resolution_1280.pdf](#)

RESOLUTION NO. 1280

A RESOLUTION OF THE CITY OF EDMONDS EXPRESSING CONCERN ABOUT IMPACTS FROM INCREASED RAIL TRAFFIC IN EDMONDS RESULTING FROM THE PROPOSED SSA MARINE GATEWAY PACIFIC RAIL TERMINAL PROJECT LOCATED IN WHATCOM COUNTY AND REQUESTING THE PRINCIPAL AGENCIES REVIEWING ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR SAID PROJECT, INCLUDING WHATCOM COUNTY, WASHINGTON DEPARTMENT OF ECOLOGY, AND THE UNITED STATES CORPS OF ENGINEERS, STUDY AND IDENTIFY THE IMPACTS TO THE CITY OF EDMONDS, AND THAT AT LEAST ONE OF THE EIS SCOPING HEARINGS BE HELD IN EDMONDS

WHEREAS, SSA Marine proposes to develop a coal and commodities export facility called Gateway Pacific Terminal (GPT) located in Whatcom County near the Cherry Point area of Bellingham Washington; and

WHEREAS, Whatcom County, Washington Department of Ecology and the United States Corp of Engineers have entered into a Memorandum Of Understanding (MOU) to jointly promulgate a required Environmental Impact Statement (EIS) and are currently scoping the EIS for the GPT project; and

WHEREAS, potential adverse impacts from the proposed GPT project, such as reduced air and water quality, increased noise levels, decreased ability to provide effective emergency response, increased risk of accidents, and impediments to transportation and pedestrian movements, will be experienced by communities along rail line corridors within the Puget Sound region; and

WHEREAS, the City of Edmonds is concerned about the probable adverse economic and environmental impacts to our community resulting from increased rail traffic; and

WHEREAS, as a result of future GPT operations, an addition of nine to eighteen coal related trains per day, each with up to four engines and 125 cars and/or 1.5 miles in length, would equate to approximately one additional coal train every 1.3 hours passing through Edmonds, all day long, in addition to existing and projected train traffic; and

WHEREAS, Burlington Northern Santa Fe rail lines run along 4.5 miles of Edmonds' coastline which is lined with single and multifamily homes, the Port of Edmonds, Edmonds Senior Center, Washington State Ferry

Terminal, Sound Transit and Community Transit Commuter Rail and Bus Station, City beaches and parks, including a nationally recognized 27-acre underwater dive park; and

WHEREAS, in Edmonds, Dayton and Main Streets/SR/104, critical arterial streets used to access the City's waterfront, intersect with an existing BNSF rail line and in the near future, two BNSF rail lines at grade, and these at-grade rail crossings slow the movement of people and goods between downtown Edmonds and the City's waterfront, thus creating mobility and safety hazards; and

WHEREAS, the Dayton Street crossing is the primary access to the Port of Edmonds, Marina Beach Park, Olympic Beach Park, Edmonds Senior Center, restaurants, businesses, residential units, etc., and the Main Street/SR104 crossing serves as the access and exit corridor for the Washington State Ferry Terminal, 27-acre Underwater Dive Park, Edmonds Senior Center, restaurants, businesses, residential units, etc.; and

WHEREAS, under existing conditions and without the additional train traffic proposed by the GPT project, loading and unloading of vehicles at the Washington State Ferry Terminal are routinely disrupted by existing trains moving along the mainline railroad tracks and such vehicles must cross existing/future BNSF rail line(s), the only at grade crossing in the Washington State Ferry System, and the addition of nine to eighteen coal related trains per day will increase the disruption of loading and unloading of vehicles at the Washington State Ferry Terminal; and

WHEREAS, due to reduced train speeds through the City of Edmonds and the need to lower approach warning crossing barriers at Main and Dayton Streets simultaneously due to their close proximity, rail crossing barriers for each train at each controlled crossing would need to be down for approximately 6-8 minutes for 1.5 mile long freight trains; and

WHEREAS, with the number of all trains per day expected to increase from the current 40 (weekday average) to as many as 70 by 2020 and 104 in 2030, the City is concerned that increased rail traffic generated from the Gateway Pacific Terminal project has the potential to adversely affect local environment and economy of Edmonds in the following ways:

- Effective emergency response times could be threatened if response times for police and fire are interrupted more frequently, and for longer periods of time, due to the length of each train
- Reductions in overall system mobility, i.e., pedestrians, bicycles, automobiles, buses, freight, etc.

- Increased risk of accidents (due to increased train traffic through pedestrian and vehicular intersections)
- A significant increase in coal train traffic will more frequently delay general commerce, commuters, and other vehicular traffic, thus impacting economic sustainability, e.g., impediments to Washington State Ferries operations and freight mobility, decreased tourism and waterfront activities due to congestion, noise, blockage, etc.,
- Delays in existing commuter and passenger train service due to lack of double tracks through Edmonds
- Air and water quality and attendant health impacts due to fugitive coal dust from trains and increased diesel exhaust from the four engines needed to operate each coal train; and the impact of which on the health of Edmonds residents and visitors is yet to be determined; and

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF EDMONDS, WASHINGTON, HEREBY RESOLVES AS FOLLOWS:

Section 1. We ask that the potential impacts to Edmonds' public health, safety, economy, traffic, and environment be studied by the agencies conducting the environmental review and request that Edmonds be included in any EIS hearing schedule pertaining to any project in the Northwest that may cause significant increases in associated rail traffic traveling via Edmonds.

Section 2. We urge the United States Corps of Engineers, Washington Department of Ecology, and Whatcom County Council to hold at least one of the environmental impact statement scoping hearings in Edmonds and to conduct thorough studies which identify and measure the major impacts to the City of Edmonds that would result from a significant increase in coal train traffic, and that said agencies include the impacts of the proposed increase in rail traffic and those referenced in this Resolution in the scope of the EIS and public hearings at the various stages of the EIS process.

Section 3. The City of Edmonds hereby urges Whatcom County, Washington Department of Ecology, and United States Corp of Engineers to fully study impacts to Edmonds, including but not limited to increased traffic congestion and delays to residents and commerce (including Washington State Ferries operations), potential impacts from coal dust and other particulates, noise, mobility, etc., in the scoping of the EIS for the GPT project,

and that adverse impacts are fully mitigated.

Section 4. That the City of Edmonds requests that the railroad provide representatives to meet periodically with local citizen groups and local government officials from Edmonds to seek mutually acceptable ways to address local concerns.

Section 5. That the City of Edmonds requests that SSA Marine and BNSF identify any improvement plans related to grading, widening, or otherwise providing crossings at intersections that would be necessary to address/mitigate impacts caused by increases in rail traffic and require that SSA and BNSF mitigate impacts by funding the design and construction of these upgrades.

Section 6. That Washington State Department Transportation, Washington Utilities and Trade Commission, Burlington Northern Santa Fe, City of Edmonds, etc., study the issue of capacity and the threshold at which point train operations essentially render connectivity between the City's downtown and Waterfront, SR104/Main Street and Washington State Ferry Terminal ineffective/inefficient/nonfunctional, and that the City's Waterfront ceases to be a place that is easily accessible and can be enjoyed by businesses, restaurants, visitors, tourists, residents, etc.

Section 7. That the City of Edmonds be made a Party of Record for all aspects of the environmental and permitting phases of the GPT project.

RESOLVED this 17th day of July, 2012

APPROVED:


MAYOR, DAVID O. EARLING

ATTEST/AUTHENTICATED:


CITY CLERK, SANDRA S. CHASE

FILED WITH THE CITY CLERK: 07-13-2012
PASSED BY THE CITY COUNCIL: 07-17-2012
RESOLUTION NO. 1280