

Name: Sumner, City of

Date: Jan. 18, 2013

City: Sumner

Part: Multiple/not listed

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

Comment:

City of Sumner
1104 Maple Street
Sumner, WA 98390

January 18, 2013

GPT/Custer Spur EIS
c/o CH2M Hill
1100 112th Avenue NE, Suite 400
Bellevue, Washington 98004

RE: Scoping for the Gateway Pacific Terminal Environmental Impact Statement

Thank you for considering the following scoping comments from the City of Sumner. The impacts discussed are likely to occur in the majority of jurisdictions along the likely rail corridor that would be used to transport coal and other goods to the Gateway Pacific Terminal (GPT) and are discussed employing general language indicative of that fact. However, these comments are intended to address off-site impacts of the GPT project that are also specific to the City of Sumner and its Urban Growth Area.

The City of Sumner's EIS Scoping comments are as follows;

1. The EIS should include analysis of the cumulative impact of all proposed coal export facilities and/or dry bulk commodity terminals within Washington and Oregon in a Cumulative Impact Analysis (CIA) pursuant to the National Environmental Policy Act (NEPA). Specifically the cumulative impact to existing freight and passenger rail traffic capacity in Washington State should be analyzed. The CIA should address associated impacts to natural resources, cultural resources, and economic conditions in rail corridors impacted by the GPT project.
2. The EIS should include analysis of health impacts of additional train traffic in the City of Sumner as well as elsewhere along likely rail corridors associated with the project. Such analysis should include examination and quantification of the impacts of coal dust, increased emissions from train locomotives, increased emissions from cars and trucks idling at rail crossings as trains pass, the health effects of chronic noise from trains, and the increased likely hood of pedestrian and automobile versus train collisions. Health impacts should also be considered to include the potential delay in emergency response attributable to added delay at road/rail crossings. All health related impacts should be addressed through a Health Impact Assessment completed by an independent third party.
3. The EIS should analyze the social impacts of the GPT project. This analysis should include detailed and realistic assessment of the impact to quality of life, developability, and economic attractiveness in areas along the likely rail corridor due to increased rail activity associated with the project. Necessary analysis includes study of the impact of increased rail activity on the potential for new business to locate near the corridor and impact on the future development of areas with existing industrial and commercial infrastructure due to increased rail activity.
4. The EIS should analyze the economic impacts of the GPT. This analysis should consider and quantify the likely trade-off associated with jobs generated at the GPT versus jobs that may be lost along the corridor due to the various impacts of increased rail traffic. This analysis should consider the potential loss of both existing jobs and the loss of competitiveness for future jobs suffered in areas subjected to delay, noise, and other impacts associated with increased rail activity. This analysis may be in the form of a cost-benefit analysis as discussed in WAC 197-11-450.
5. The EIS should analyze the cost of each specific necessary impact mitigation measure associated with the GPT. The estimated costs and sources of funding for impact mitigation measures set forth by the EIS should be identified and the likely financial impact on the taxpayers of each community and unit of local government along the likely rail corridor associated with these measures should be estimated. The City of Sumner asks that the cost of mitigation measures such as grade-separated rail crossings and/or other street crossing improvements, wayside-horns, noise attenuation walls, business or residential displacement, and other similar potential measures be specifically provided for all areas within the City of Sumner and its Urban Growth Area.
6. The EIS should analyze the impacts of the GPT on the City of Sumner's comprehensive plan goals and standards and related zoning provisions. This analysis should include at a minimum impacts on the potential to successfully attract and develop mixed-use/transit oriented development near the BNSF rail line and Sounder commuter rail station, the impact to adopted traffic Levels of Service (LOS) at nearby intersections and street segments. This analysis

should include the impacts on Sounder ridership and associated investments in commuter infrastructure.

The City of Sumner looks forward to the inclusion of the preceding issues in the scope of the upcoming project EIS. Please include the City on the notification list employed for soliciting comments on the Draft EIS when it is published.

Sincerely,
Dave Enslow, Mayor

cc: City Council members
Paul Rogerson, AICP, SEPA Responsible Official, City of Sumner
