



**SEATTLE PARKS
AND RECREATION**

100 Dexter Avenue North
Seattle, Washington 98109

Seattle Board of Park Commissioners

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January 15, 2013

GPT/BNSF Custer Spur EIS
Co-Lead Agencies
1100 112th Ave. NE, Suite 400
Bellevue, WA 98004

To Whom It May Concern:

The Seattle Board of Park Commissioners thank you for the opportunity to comment on the Environmental Impact Statement (EIS) scoping for the Gateway Pacific Terminal (GPT) and attendant induced traffic, particularly coal-filled trains as they move through the City of Seattle.

As a Board, our role is to advise Seattle's Mayor and Council regarding issues facing the management and operations of City of Seattle's parks and open space resources. This includes parks, playgrounds, playfields, natural areas and shorelines, as well as the roads, sidewalks and trails that make these resources accessible to our residents and visitors. These assets serve both people--many of whom come from at-risk, underserved and/or vulnerable populations like children, the elderly or homeless--and the environment. These precious public spaces help make the air, water and soil cleaner through our stewardship of streams and urban forests. These spaces are also critical assets in the City's ongoing climate adaptation and mitigation efforts. And finally, we are concerned about the public accessibility to these invaluable assets.

We are writing today because we are concerned that a number of park and open space assets lie within close proximity to the rail lines that will carry coal to the proposed GPT. We have included a map as an attachment to this letter noting the park assets that may be impacted.

As stakeholders, we have three types of concerns related to the proposed GPT, that we would like to see addressed within the scope of the EIS: cumulative risks, proximate risks long-term property risks and public health risks. Each of these is explained in more detail below.

Concerns about Cumulative Risks

First, we strongly urge that the EIS measure the impacts of the GPT beyond the terminal itself. The human and environmental health concerns for these communities where these coal trains would pass are real. We feel strongly that for the EIS to be silent on these matters will not give elected officials nor the public all of the information they need to make an informed decision about the project.

Second, we recognize that there are existing coal trains traveling through Seattle. This traffic represents an existing baseline level of coal train impacts on Seattle's parks and open space assets. Thus we ask that the cumulative impacts of both the existing coal trains, as well as the additional expected induced coal train traffic, be included within the scope of the GPT EIS.

Third, we are concerned that, while there are estimates regarding how many trains will be traveling through our community, there is no guarantee that is a firm cap. If more coal trains travel the rail corridor than currently projected, we would expect more impacts, yet there is no review, appeal or engagement process to assess and mitigate those additional impacts. This is a significant concern and adds uncertainty to our understanding of the cumulative risks and impacts for our parks and open space assets.

Concerns about Proximate Risks

For our community, we are particularly concerned about the proximate impacts from increased coal train traffic on properties adjacent to the rail corridor, including potentially serious impacts to human and environmental health. Some of these proximate impacts include:

- **What are the impacts on air pollution?** Both coal dust and diesel particulates are of concern, especially to the young and elderly who use our parks. Children are disproportionately impacted due to their size, and the elderly are disproportionately impacted due to their fragility. We also understand that coal dust retardants may contribute to poor air quality as well, and ask that these be studied and better understood. Additionally, how will the resulting pollution from coal being burned and particulates migrating here from Asia impact our general air quality? This is a secondary air pollution concern, but one related to the region's compliance with national clean air laws.
- **What are the impacts on water pollution?** Diesel and coal dust particulates are concerns for the streams and shorelines along the route. Our residents and visitors cherish these assets and use them to swim in and eat from. We are all concerned about the impacts to fish stocks, due to a worry about mercury accumulation and accelerated ocean acidification from coal dust and burning. Tribal communities who culturally have a long history of fishing are extremely concerned how this could disproportionately impact their communities.
- **What are the impacts on soil pollution?** Within a short distance from the train lines lie playfields with both natural and artificial soils, playgrounds, P-Patches and community gardens, golf courses and beaches. The Seattle residents and visitors that frequent these spaces expect that the soil they and their children play in is clean and safe to touch. They expect the produce they pull from the soil is safe to eat. They expect the

playgrounds are not contaminated. How will the additional coal train traffic impact these places? Will soil be contaminated by coal dust or additional diesel particulates? How will soil pollution affect our streams as pollution runs into them?

- **What are the impacts on noise pollution?** Additional train traffic may mean more noise pollution, for residents within earshot of the train tracks. The increased noise levels in areas close to rail lines could potentially impact the quality of sleep, restlessness and fatigue which in turn could impact overall individual health. How will this be mitigated or reduced?
- **Will there be more frequent train-related accidents?** More frequent trains could increase the potential for accidents at intersections, along the track and at stations for cars, bikes, and pedestrians. How will the increased number of trains impact the number and frequency of accidents and how will it be mitigated?
- **How will park access be delayed?** Several of our parks are accessed by streets, trails and/or sidewalks that are impeded by existing train traffic. We expect that these delays will only increase with additional train traffic. We ask that additional access delays be considered as part of the GPT EIS scope. We also would like you to address the increased exposure to automobile exhaust from idling to park users. We are concerned that increased access interruptions will have added negative impacts for parks and community centers users.
- **What happens if a train derails?** If a derailment occurs enroute to the terminal, what are the potential threats to soil, water and air? What, if any, mitigation/response measures are in place to minimize these threats? Particularly along the Puget Sound or near playfields and playgrounds these are significant concerns for our community.
- **Will property values decrease?** Seattle Parks and Recreation relies on allocations from the City's General Fund and voter-approved property tax levies for funding. Will additional train traffic decrease the city's property values and hence decrease available funding for operations?

Concerns about Long-Term Property Risks Concerns

In addition to the proximate and cumulative concerns outlined above, we have long-term existential concerns for the City's parks and open space assets. As we know, the burning of coal contributes to global climate change. Locally, scientists predict rising sea levels and increased precipitation. Both of these give us pause as the stewards of Seattle Parks and Recreation's open space assets. Not only will a rising Puget Sound imperil Seattle's parks including Lincoln, Alki, Puget, Seacrest, Herring House, the Central Waterfront, Discovery Park, Smith Cove Park, Golden Gardens, Myrtle Edwards and Carkeek Parks, it will also increase storm water management costs and threaten our already stressed urban forest, which is one of the best assets we have in adapting to a changing climate. How will the long-term health impacts from this increased coal burning be addressed in this project?

Concerns about Public Health Risks

Our research indicates that there are varying considerations regarding how far the impacts of diesel particulates and coal dust would spread from the rail corridors themselves. This seems a critical first step toward understanding the long-term environmental and human health impacts of this proposal. How far will the coal dust spread from the rail corridors and how will it impact human health in the areas impacted?

Second, most of the concerns listed above have significant potential for impacts to human health. Therefore, we suggest that an extensive health impact assessment (HIA) be conducted in conjunction with the traditional EIS to evaluate those impacts from a public health perspective. We also urge the HIA be an integral part of the EIS and that it receives equal attention in mitigation and project development.

Thank you for the opportunity to share our thoughts. We look forward to reading the GPT EIS.

Sincerely,



Diana Kincaid, Chair
Seattle Board of Park Commissioners

Attachments

CC:

Seattle Mayor's Office
Seattle City Council
Department of Parks and Recreation
Seattle Planning Commission
Washington Recreation & Park Association (WRPA)
Washington Chapter American Society of Landscape Architects (WASLA)
Washington Chapter American Planning Association (WAPA)
Futurewise
City of Tukwila
City of Edmonds
City of Mukilteo
City of Shoreline
City of Woodway
Seattle Tilth
P-Patch Trust
Interbay P-Patch
Senator Maria Cantwell
Senator Patty Murray
Representative Jim McDermott
Representative Reuven Carlyle
Representative Jessyn Farrell
Representative Gael Tarleton
Senator Ed Murray
Representative Jamie Pederson
Representative Sharon Tomiko-Santos
House Speaker Frank Chopp
Representative Joe Fitzgibbon
Washington State Park Commission
Washington State Board of Natural Resources
Seattle Parks Foundation
Central Waterfront Committee Chairs
Port of Seattle Commissioners

Seattle Parks

within 1/2 Mile of
BNSF main line

4 Community Centers
4 ELCs
16 Play Areas
12 Basketball Courts
5 Tennis Courts
19.17 Miles of Trails
765 Acres of Park Property



Seattle Park Features within 1/2 Mile of BNSF main line

- BNSF main line
- Basketball Court
- Tennis Court
- ◆ Play Area
- Special Garden
- Environmental Education Center
- Community Center
- ▭ Boat Ramp
- Park Trails
- Train Tunnel
- 1/2 Mile Buffer of BNSF main line

Park	ADDRESS	TYPE	Year	Area	Cost	Notes	Source
Discovery Park	15000 1st Ave S	Play Area	2008	1.0	\$1,000,000		Seattle Parks & Rec
Golden Gardens	10000 1st Ave S	Play Area	2008	1.0	\$1,000,000		Seattle Parks & Rec
Alki Beach	10000 1st Ave S	Play Area	2008	1.0	\$1,000,000		Seattle Parks & Rec
Discovery Park ELC	15000 1st Ave S	Environmental Education Center	2008	0.5	\$500,000		Seattle Parks & Rec
Discovery Park CC	15000 1st Ave S	Community Center	2008	0.5	\$500,000		Seattle Parks & Rec
Golden Gardens CC	10000 1st Ave S	Community Center	2008	0.5	\$500,000		Seattle Parks & Rec
Alki Beach CC	10000 1st Ave S	Community Center	2008	0.5	\$500,000		Seattle Parks & Rec
Discovery Park Boat Ramp	15000 1st Ave S	Boat Ramp	2008	0.2	\$200,000		Seattle Parks & Rec
Golden Gardens Boat Ramp	10000 1st Ave S	Boat Ramp	2008	0.2	\$200,000		Seattle Parks & Rec
Alki Beach Boat Ramp	10000 1st Ave S	Boat Ramp	2008	0.2	\$200,000		Seattle Parks & Rec
Discovery Park Trail	15000 1st Ave S	Park Trail	2008	0.5	\$500,000		Seattle Parks & Rec
Golden Gardens Trail	10000 1st Ave S	Park Trail	2008	0.5	\$500,000		Seattle Parks & Rec
Alki Beach Trail	10000 1st Ave S	Park Trail	2008	0.5	\$500,000		Seattle Parks & Rec
Discovery Park Special Garden	15000 1st Ave S	Special Garden	2008	0.2	\$200,000		Seattle Parks & Rec
Golden Gardens Special Garden	10000 1st Ave S	Special Garden	2008	0.2	\$200,000		Seattle Parks & Rec
Alki Beach Special Garden	10000 1st Ave S	Special Garden	2008	0.2	\$200,000		Seattle Parks & Rec
Discovery Park Tennis Court	15000 1st Ave S	Tennis Court	2008	0.1	\$100,000		Seattle Parks & Rec
Golden Gardens Tennis Court	10000 1st Ave S	Tennis Court	2008	0.1	\$100,000		Seattle Parks & Rec
Alki Beach Tennis Court	10000 1st Ave S	Tennis Court	2008	0.1	\$100,000		Seattle Parks & Rec
Discovery Park Basketball Court	15000 1st Ave S	Basketball Court	2008	0.1	\$100,000		Seattle Parks & Rec
Golden Gardens Basketball Court	10000 1st Ave S	Basketball Court	2008	0.1	\$100,000		Seattle Parks & Rec
Alki Beach Basketball Court	10000 1st Ave S	Basketball Court	2008	0.1	\$100,000		Seattle Parks & Rec

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Map date: Nov 21, 2012

Seattle Parks and Recreation property within 1/2 mile of BNSF Rail line												
PARK NAME	ADDRESS	CC	ELC	Special Garden	Play Area	Tennis Court	Basketball Court	Baseball Field	Soccer Field	Football Field	Running Track	Boat Ramp
Alaskan Way Boulevard	Alaskan Way between Broad and Bay											
Bayview Playground	2614 24th Ave W				Yes			1	1			
Bell Street Boulevard	Bell Street from 1st Ave to 5th Ave											
Belltown Cottage Park	2512 Elliott Ave											
Belltown P-Patch	2512 Elliott Ave				Yes			2				
Benefit Playground	9320 38th Ave S											
Blaine Place	W Olympic Pl / 6th Ave W											
Blue Ridge Circle	NW Blue Ridge Dr/NW Roundhill											
Blue Ridge Places	NW Milford Way / Radford Ave NW											
Boren Place	Broadway / Boren Ave S											
Carkeek Park	950 NW Carkeek Park Rd			Carkeek Park ELC	Yes							
City Hall Park	450 3rd Ave											
Cleveland Playfield	S Lucile St / 13th Ave S								1		1	
Commodore Park	3330 W Commodore Way											
Counterbalance Park	700 Queen Anne Ave N											
Discovery Park	3801 W Government Way			Discovery Park ELC	Yes	2		1				
Discovery Park Tidelands	North of West Ruffner											
Dr. Jose Rizal Park	1008 12th Ave S				Yes							
East Duwamish Greenbelt:	Cecil Ave S											
East Duwamish Greenbelt:	2799 12th Ave S											
East Duwamish Greenbelt:	4599 10th Ave S											
Ella Bailey Park	2601 W Smith St				Yes							
Freeway Park	700 Seneca St											
Georgetown Playfield	750 S Homer St				Yes	1		1	2	1		
Golden Gardens Park	8800 Seaview Ave NW			Golden Gardens Park	Yes							Yes
Hing Hay Park	423 Maynard Ave S											
Hing Hay Park	423 Maynard Ave S											
Horiuchi Park	156 Boren Ave.											
Id/Chinatown Community	701 8th Ave. South.			International District CC								
Interbay Athletic Field	3027 17th Ave W								2	2	1	
Interbay Golf	2501 15th Ave W											
Interbay P-Patch	2501 15th Ave W											
International Childrens Parl	700 S Lane St				Yes							
Kerry Park (Franklin Place)	211 W Highland Dr											
Kerry Park & Viewpoint	211 W Highland Dr				Yes							
Kinnear Park	899 W Olympic Pl											
Kinnear Place	Queen Anne Ave/W QA Dr											
Kiwanis Memorial Preserve	34th Ave W / W McCord Pl											
Kiwanis Ravine Overlook	36th Ave W / Ohman Pl											
Kobe Terrace	221 6th Ave S											
Lawton Park	3843 26th Ave W				Yes				1	1		

