



U.S. Department of Housing and Urban Development

Seattle Regional Office
Seattle Federal Office Building
909 First Avenue, Suite 200
Seattle, WA 98104-1000

January 17, 2013

Alice Kelly, Northwest Regional Office, Department of Ecology

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

Tyler Schroeder, Planning and Development Services, Whatcom County

GPT/BNSF Custer Spur EIS Co-Lead Agencies
c/o CH2M HILL
1100 112th Avenue NE, Suite 400
Bellevue, WA 98004

Subject: EIS Scoping Comments for Proposed Cherry Point Terminal

Dear Ms. Kelly, Mr. Perry and Mr. Schroeder:

The Department of Housing and Urban Development (HUD), Region 10, would like to submit comments with respect to the EIS scoping process for the Cherry Point Terminal in Washington State. HUD Region 10 covers the four states of Alaska, Idaho, Oregon, and Washington.

Our region would like the three Co-Lead Agencies, The U.S. Army Corps of Engineers, the Washington Department of Ecology and Whatcom County, to consider noise from the increased train traffic to the proposed port along the entire transportation route. We also request the Co-Lead Agencies to consider the cumulative impact of the three proposed Pacific Northwest port facilities in its EIS review.

Noise

The Project Information Document for the Gateway Pacific Terminal includes the following statement on noise: "Noise has not been re-evaluated since the 1996 Draft EIS. A complete study of the affected environment, an impact analysis, and evaluation of design features to reduce impacts, if necessary, is anticipated for completion in April 2011" (Section 5.15.1). The 1996 Draft EIS appears to focus primarily on construction noise. We strongly urge the Co-Lead Agencies to look at the noise from the increased train traffic along the entire transportation route.

HUD's concern is that the project will involve an increase in train traffic along population centers. The Project Information Document for the Gateway Pacific Terminal predicts there will be 18 train movements per day at the terminal (9 loaded trains arriving and 9 empty trains leaving), with most of these trains 8,500 feet long. A train this length has

approximately 147 cars, requires 4-5 locomotives and represents a significant increase in noise along the entire route from source to port.

When HUD funds housing or other noise sensitive uses such as nursing homes and daycare facilities, we are required to consider noise impacts to our projects. Our regulation (found at 24 CFR Part 51B) stems from The Noise Control Act of 1972 which applies to all federal agencies. We look primarily at noise from roads, railroads and airports. If the noise is greater than 65 decibels at a project site, we require either extensive noise mitigation for both indoor and outdoor uses or reject the project. In addition, our regulation requires us to encourage the control of noise at its source in cooperation with other Federal departments and agencies through comments on EIS reviews.

We therefore request that the EIS consider the noise impacts from the additional freight trains. The communities along the route could be at risk to lose future HUD funding for projects due to the increased noise from the train traffic. Rates of psychoacoustic impacts such as sleep loss, irritability, increased risk of hypertension, and reduced attention span could also rise. Considering the noise at the design and planning stage is the most cost-effective and responsible course of action. HUD believes that the noise impacts are most effectively mitigated at the source, rather than requiring existing housing and future development to react to the increased noise, either by precluding new housing or requiring expensive noise mitigation measures by the community rather than by the generator. We recommend that the project use HUD's 1991 Noise Assessment Guidelines (HUD-953-CPD(1)) to quantify the impact of the noise on intervening communities and the 2006 Federal Transit Administration Noise and Vibration Impact Assessment Manual (FTA-VA-90-1003-06) to assess the vibration impact. We also recommend that the project include noise barrier walls along population centers or areas slated for future development.

Cumulative Impacts

The Cherry Point Terminal is one of three deep-water ports with permit applications in Washington and Oregon. The number of trains passing through population centers in our region could therefore be many times the number discussed for the Cherry Point Terminal alone. HUD suggests the Co-Lead Agencies either include the cumulative impacts from all three proposed ports in this EIS, or conduct an Areawide EIS that covers all three ports. The train traffic from all three ports could have a significant noise impact on communities in our region and in order to accurately and comprehensively address this impact, it needs to be considered as a whole.

Thank you for your consideration. If you have any questions or would like to discuss this letter further, please contact Sara Jensen, Field Environmental Officer at 206-220-5226 or sara.jensen@hud.gov.

Sincerely,



Deborah Peavler-Stewart
Regional Environmental Officer