KENT
WASHINGTON

OFFICE OF THE MAYOR
Suzette Cooke, Mayor
220 4th Avenue South
Kent, WA 98032
Fax: 253-856-6700

PHONE: 253-856-5700

January 14, 2013

GPT/Custer Spur EIS
C/O CH2M HILL
1100 112th Avenue NE, Suite 400
Bellevue, WA 98004

RE: Combined NEPA and SEPA Scoping for the Proposed Gateway Pacific Terminal and Custer Spur

Dear EIS Co-Leaders:

The City of Kent offers the following comments on the combined NEPA and SEPA scoping for the proposed Gateway Pacific Terminal (GPT) and associated Custer Spur. The City is particularly concerned about the economic and environmental impacts from the increased train activity through the heart of the City. The Burlington Northern Santa Fe (BNSF) track runs through and bisects the City of Kent running north/south. These impacts are significant and require that the study area be expanded to include communities along the travel path as well as at the terminus at Cherry Point.

The City of Kent is the sixth largest city in the State of Washington with over 119,000 residents. The City holds the fourth largest Industrial and Warehouse Distribution Center in the nation and is the second largest on the west coast. Kent is located in South King County which has been identified as home to some of the most fragile health populations in the county. A King County Health Department study found that 31% of the population in South King County suffers from obesity and associated chronic illness including diabetes and pulmonary disease. This percentage is double that found in the rest of the county. South King County has the highest percentage of diversity and multicultural ethnicity in the region and impacts to these communities should be analyzed under the Environmental Justice umbrella. These quick facts about the City of Kent will help set the stage for understanding the following concerns and comments related to Scoping the project.

Transportation, Congestion, Safety

There is uncertainty regarding the number of additional trains that will be added to existing rail facilities but estimates indicate an initial complement of nine round-trip or 18 total daily trains, each up to a mile and a half long. The impacts to local traffic congestion and the level of service on the local road network should be examined. Future traffic congestion impacts need to be evaluated based on a realistic expectation of future coal train traffic and not just this initial minimum number of proposed trips at start-up.

The City of Kent has eight at-grade crossings on the BNSF line, most of which are in the downtown urban center. The combined daily traffic on these eight cross streets is roughly 100,000 vehicles. A study of crossing delay estimated a range of 45 to 90 minutes of additional delay every day from these 18 new coal trains. (Total time of delay varies with speed of the train.) As the number of trains increases, the potential for accidents and fatalities increases. The mobility and safety impacts from

this increased train traffic need to be evaluated in the EIS.

Increased traffic congestion and crossing delays will increase tailpipe emissions from stopped and idling vehicles and increased diesel emissions from train engines. These impacts to traffic congestion and air quality need to be evaluated in the EIS.

The addition of this significant street closure time due to 18 or more long trains per day increases delay to Fire Department and Police personnel responding to emergency calls and to medical transport vehicles moving patients to area hospitals.

It increases daily delay to school buses which puts increased burden on financially strapped school districts to increase their fleets and transportation budgets to restore the transit times they originally planned for picking up children and transporting them to local schools.

It increases delay to workers trying to access jobs and negatively impacts the city's major employment sector moving freight in and out of the Kent Manufacturing/Industrial Center. It increases delay of shipping valuable commodities to the Port of Seattle and the Port of Tacoma as well as short-haul distribution of imported goods to local businesses.

How would this addition of 18 coal trains affect other rail capacity? Residents and businesses in Kent rely on Sound Transit Commuter Rail as a preferred mode of transportation for commuters. Will this traffic supplant or preclude additional Sounder Rail service? The EIS should look at how this project will affect competition for future rail capacity and opportunities for more favorable or higher uses of the track time.

Kent has spent considerable time and local financial investment in bicycle facilities and new transit facilities. Bus schedules are timed to meet commuter rail schedules at the Sound Transit Kent Station. The City's signal timing and corridor progression are coordinated to assist bus routes in reaching the Kent Transit Center on schedule for transfers to Commuter Rail or Express commuter bus service. The BNSF tracks separate the majority of Kent residential neighborhoods from the Commuter Rail and Transit Center. The EIS should examine to what extent the additional hour to two and half hour delay every day at crossings would affect bicycle, pedestrian and transit users throughout the coal train corridor.

According to the 2012 Washington State Congestion Report, the cost of congestion is $21.90 per hour. Considering 18 trains per day imposing anywhere from one to two and a half hours of delay and around 100,000 vehicles being affected, many with more than one occupant, the cost of delay could be estimated to be in the millions of dollars to Kent residents and businesses alone. The EIS should examine the magnitude of this economic cost to communities along the corridor.

The EIS should consider the impacts to the existing 900 households and 3,700 jobs in the downtown, as well as impacts to planned future growth in households and jobs in this existing regionally-designated urban center where most significant increases in jobs and housing are expected to occur.

- Public Health

  Proximity to rail lines provides significant exposure to toxic diesel exhaust. The proposed coal trains would be powered by four engines each spewing diesel engine particulate emissions from 72 engines per day. The Environmental Justice impacts to low-income communities from this toxin need to be examined in the EIS.

  Studies on coal dust from the transport of these commodities indicate anywhere from 500 to 2,000 pounds of coal dust will escape from each and every car on every coal train. The cumulative effects of coal dust from over 400,000 loaded coal cars per year and another potential 400,000 unloaded coal cars need to be examined in the EIS. How would this affect levels of asthma attacks, pulmonary inflammation, bronchitis, emphysema and cancer in our local community?

  Noise, diesel emissions, and toxic coal dust from the increased rail traffic will negatively impact the livability of Kent's neighborhoods and the health of our population. The EIS should examine the degree to which these negative externalities affect people and property in residential communities and business districts along the travel corridor.

- Noise and Vibrations

  The City of Kent is in the process of pursuing a Quiet Zone for its downtown area. The EIS should study what effect the addition of 18 or more trains that are up to a mile and a half long will have on this community and others in the pursuit of noise abatement and future Quiet Zone implementation.

  In January 2012 a hillside on the east side of the BNSF tracks slid - propelling mud, trees and utilities into the East Valley Highway. The soils in the Kent Valley are great transmitters of vibrations and could make future development in the downtown core problematic if there is an additional one to two hours of new ground-transmitted vibrations from coal trains. The effect of vibrations on hillsides and the extra costs associated with projected household and job growth along the train corridor should be studied in the EIS.

  Environmental

  The Kent Valley is part of the Green River/Duwamish watershed and host to many species of fish and wildlife. Salmonid species present in the watershed include Chinook, Chum, Coho, Sockeye, and Pink salmon, Bull Trout and Cutthroat trout.

  Coal dust from these additional trains will settle on environmentally sensitive wetlands in the Kent Valley. The EIS should study the effect of coal dust on wetlands and floodplains, and its transmission to streams and rivers.

  The EIS should consider impacts on the Green River and Mill Creek which provide designated critical habitat for listed species. In the Green River this includes three listed salmon species, namely: Chinook, Bull Trout and Steelhead.

  Coal dust particles from the proposed GRT trains would deposit heavy metals and other toxic chemicals that settle in soils and water. The EIS should evaluate the magnitude of

the impacts to aquatic life, wildlife and people.

The EIS needs to examine and mitigate the full impacts to the health, environment, and economic viability of local communities along the entire proposed coal train corridor. Although it's questionable whether the above impacts could be adequately mitigated, the EIS should consider mitigation measures such as, covering and securing the coal in the rail cars, both for dust control and securing cargo in the event of derailment; construction of overpasses/underpasses to address impacts to the local transportation system; monetary assistance for commercial, industrial and retail construction enhancements to mitigate noise and vibration; control of air emissions from train engines; and track improvements and equipment to mitigate noise from the trains. The City of Kent wishes to become a Party of Record regarding the Gateway Pacific Terminal and Custer Spur and be included in any further elements of the EIS.

Sincerely,

Suzette Cooke, Mayor
City of Kent

Dennis Higgins
Kent Council President

Elizabeth Albertson
City Council Member
Chair of the Public Works Committee

Deborah Ranniger
City Council Member
Chair of the Parks Committee

Bill Boyce
City Council Member
Chair of the Public Safety Committee

Dana Ralph
City Council Member

Jamie Perry
City Council Member
Chair, ECD Committee

Les Thomas
City Council Member
Chair, Operations Committee