

November 6, 2012

Mr Tyler Schroeder, Whatcom County

Mr Randel Perry, U.S. Corps of Engineers

Ms Jeannie Summerhays, Washington State Department of Ecology

Re: Scoping for Draft EIS for Proposed Gateway Pacific Terminal, Cherry Point, Whatcom County

In the middle of unpopulated area in the midwest, a small teacher's college had been built near the railroad. By the time that my wife and I moved there, decades later, the college had grown to become a university, the town now crowded both sides of the tracks, and every train created a traffic jam. Of greater concern than the inconvenience of waiting was the fact that the railroad separated our home from the hospital. My wife was pregnant. In a medical emergency, a train could prevent us from reaching the hospital in time. The risk was small, but the fear, not so much.

My Concern: A greater frequency of trains than that for which train tracks were planned may also alter patterns of traffic at local crossing. An increased frequency of trains which are of greater length - to the maximum that the line will bear – are going to create increased barriers and longer waiting times at crossings. People who use these crossings need accurate information about probable impacts.

Inconvenience, increased danger of collision, and greater likelihood of obstructed emergency vehicles - all of these may reasonably be expected. At many locations, the cumulative number of people over time who experience delay at crossings due to the additional number of longer trains may soon include the entire local population.

Requested Studies: Please study crossings, particularly at urban areas, from the Powder River Basin to Cherry Point. Study frequency and duration of crossings blocked by train traffic, showing increases as a consequence of the increased number of trains proposed coal-export terminal. Predict increases in (1) accidental collision, and (2) impeded emergency vehicles – or *any* vehicle impeded while in use during an emergency.

Presumably the risks are greatest where trains pass directly through town and local traffic has not been safely re-routed. However, rural RR crossings might be the most lethal, as drivers anticipating a long wait at an isolated crossing lacking adequate safety barriers are tempted to try to “beat the long coal train” they see approaching.

Please estimate the probability of accidents and impeded emergency vehicles at each crossing. Estimate how many people are at risk for various types of incidents each year, and how many may be expected to be injured or to die. If source data are obtained from BNSF, verify the data accuracy by sampling and comparing similar data from independent safety studies.

Please study locations where mitigations may be required to accommodate the overwhelming impact of an increased frequency of trains upon local traffic. The railroad pays (at most) a very limited share of the cost of mitigations, while the rest comes from taxes. Taxpayers need accurate information regarding the size of the burden due to the proposed increase in train traffic. Estimate the range of *complete* costs,

including the *indirect* costs, such as inconvenience during construction, as well as *direct* dollar costs for mitigations which are necessary in order to maintain risks at or below acceptable levels.

Alternatives: No action. Do not permit terminal expansion for coal-export.

Mitigations: Underpasses, overpasses, re-routing of local traffic and safety equipment for crossings.

Research: Studies below describe “potentially severe consequences” for transportation planning at five urban areas along the rail line, but findings are described as “preliminary”. These studies are needed, but how can decisions cannot be made on the basis of preliminary findings?

No Action should be taken until studies have been completed and findings are deemed sufficient to be described as “final”. No action should be taken until adequate studies have been completed at a representative sample of crossings.

<https://docs.google.com/viewer?url=http%3A%2F%2Fwww.coaltrainfacts.org%2Fdocs%2FGTC-Seattle-Traffic-Report.pdf>

<https://docs.google.com/viewer?url=http%3A%2F%2Fwww.coaltrainfacts.org%2Fdocs%2Ftraffic-study-Burlington.pdf>

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Respectfully,

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