



**SEATTLE PARKS
AND RECREATION**

100 Dexter Avenue North
Seattle, Washington 98109

Seattle Board of Park Commissioners

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| <i>Jourdan Keith, Vice-chair</i> | <i>Barbara Wright</i> |
| <i>Diana Kincaid, Chair</i> | |

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

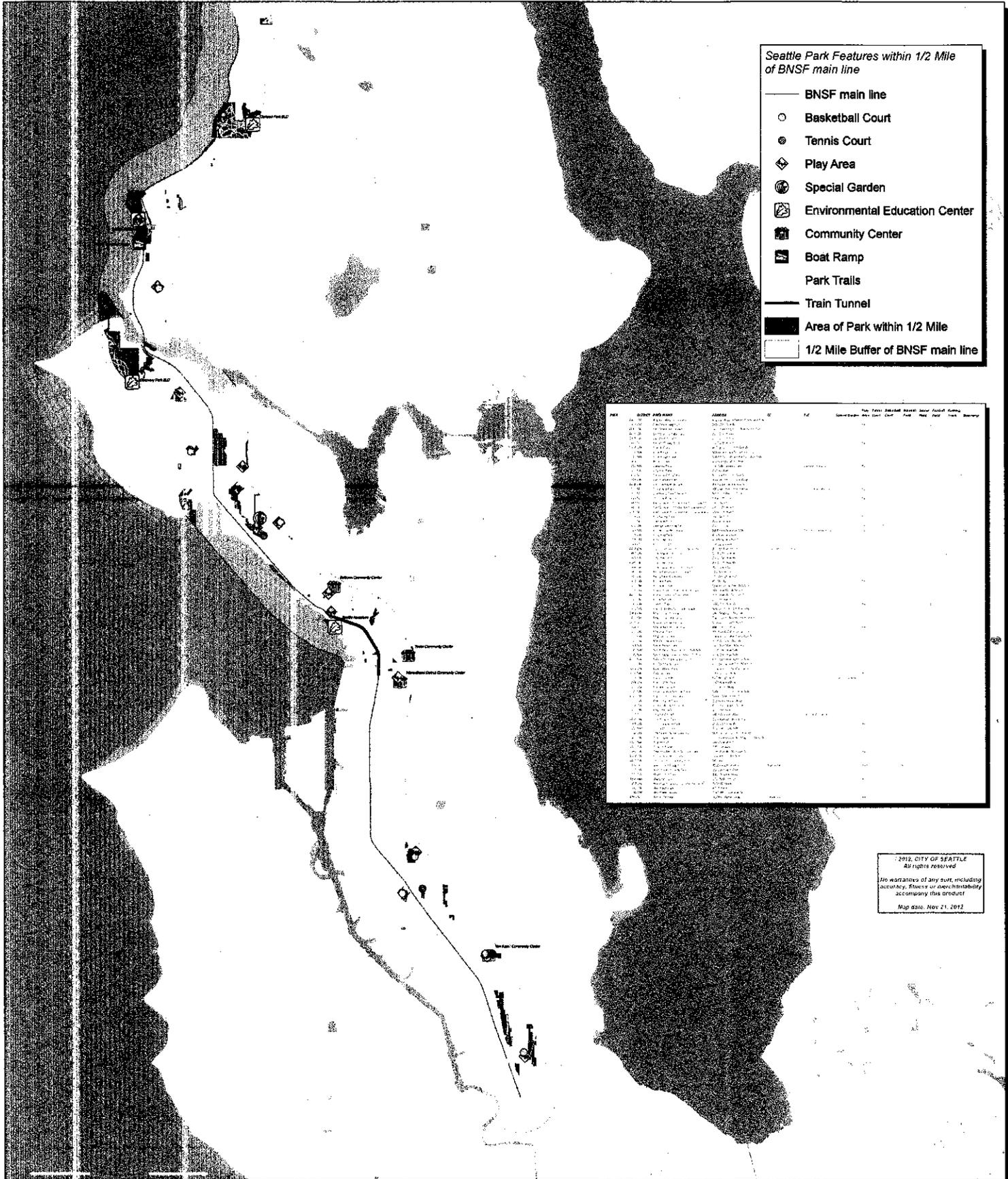
CC:

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
- Area of Park within 1/2 Mile
- 1/2 Mile Buffer of BNSF main line

| NO. | NAME | ADDRESS | TYPE | STATUS | DATE | REMARKS |
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accompany this product.
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 | | | | Yes | | | 1 | 1 | | | |
| Bayview Playground | 2614 24th Ave W | | | | | | | | | | | |
| Bell Street Boulevard | Bell Street from 1st Ave to 5th Ave | | | | | | | | | | | |
| Belltown Cottage Park | 2512 Elliott Ave | | | | | | | | | | | |
| Belltown P-Patch | 2512 Elliott Ave | | | | | | | | | | | |
| Benefit Playground | 9320 38th Ave S | | | | Yes | | | 2 | | | | |
| 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 Par | 700 S Lane St | | | Yes | | | | | | | | |
| Kerry Park (Franklin Place) | 211 W Highland Dr | | | | | | | | | | | |
| Kerry Park & Viewpoint | 211 W Highland Dr | | | | | | | | | | | |
| Kinnear Park | 899 W Olympic Pl | | | Yes | | | | | | | 1 | |
| 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 | | |

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|----------------------------|----------------------------------|--|--|--|--|---|---|---|--|
| Llandover Woods Greensps | NW 145th St / 3rd Ave NW | | | | | | | | |
| Magnolia Boulevard | 1461 Magnolia Blvd W | | | | | | | | |
| Magnolia Greenbelt | Dartmouth Ave W / W Howe St | | | | | | | | |
| Maple School Ravine | S Orcas St / 18th Ave S | | | | | | | | |
| Maple Wood Playfield | 4801 Corson Ave S | | | | | 1 | 2 | 1 | |
| Maple Wood Park | 7th Ave W / W Highland Dr | | | | | | | | |
| Marshall Park | Stewart St / Westlake Ave N | | | | | | | | |
| Mcgraw Square | 3130 Alaskan Way W | | | | | | | | |
| Myrtle Edwards Park | 24th Ave NW / NW 90th St | | | | | | | | |
| North Beach Park | 9100 28th Ave NW | | | | | | | | |
| North Beach Ravine: 30th I | 9100 28th Ave NW | | | | | | | | |
| North Beach Ravine: NW 9 | 6001 Seaview Avenue NW | | | | | | | | |
| NW 60th Street Viewpoint: | Occidental Ave S / S Main St | | | | | | | | |
| Occidental Square | Tideland, Ell By Marina-Term 90 | | | | | | | | |
| Open Water Park | 6400 Corson Ave S | | | | | | | | |
| Oxbow Park | 650 W Highland Dr | | | | | | | | |
| Parsons Gardens | 1951 Alaska Way | | | | | | | | |
| Piers 62 And 63 | 100 Yesler Way | | | | | | | | |
| Pioneer Square | NW 120th St / 6th Ave NW | | | | | | | | |
| Pipers Creek Natural Area | Boren Ave / Pike St | | | | | | | | |
| Plymouth Pillars Park | 3rd Ave / Yesler Way | | | | | | | | |
| Prefontaine Place | Encircles Queen Anne Hill | | | | | | | | |
| Queen Anne Boulevard | 2251 3rd Ave | | | | | | | | |
| Regrade Park | 1483 Alaskan Way | | | | | | | | |
| Seattle Aquarium | 23rd Ave W / W Marina Pl | | | | | | | | |
| Smith Cove Park | 2500 11th Ave W | | | | | | | | |
| Soundview Terrace | 7531 34th Ave NW | | | | | | | | |
| Sunset Hill Park | W Emerson St / 36th Ave W | | | | | | | | |
| SW Queen Anne Greenbelt | Thorndyke Ave W / Magnolia Way W | | | | | | | | |
| Thorndyke Park | 2853 NW 58th St | | | | | | | | |
| Thyme Patch Park | 2701 5th Ave | | | | | | | | |
| Tilkum Place | 12th Ave W / W Howe St | | | | | | | | |
| Twelfth West And W Howe | Jackson St / 3rd Ave S | | | | | | | | |
| Union Station Square | W Galer St | | | | | | | | |
| Ursula Ludkins Viewpoint | 7200 Beacon Ave S | | | | | | | | |
| Van Asselt Playground | 2001 Western Ave | | | | | | | | |
| Victor Steinbrueck Park | 1301 Alaskan Way | | | | | | | | |
| Waterfront Park | 3014 NW 67th St | | | | | | | | |
| Webster Park | 1403 W Howe | | | | | | | | |
| West Central Grounds Mair | 401 Pine St | | | | | | | | |
| Westlake Park | 1900 Westlake Ave N | | | | | | | | |
| Westlake Square | 917 East Yesler Way | | | | | | | | |
| Yesler Terrace CC | Yesler CC | | | | | | | | |