



City of Stanwood

10220 270th Street NW
Stanwood, Washington 98292
(360) 629-2181

GPT/BNSF Custer Spur EIA Co-Lead Agencies
c/o CH2M HILL
1100 112th Ave N.E. Suite 400
Bellevue, WA 98004

Dear Sir or Madam;

This letter is a follow-up to the City of Stanwood letter of May 14, 2012 requesting Party of Record status regarding the proposed rail terminal project in Whatcom County (the Gateway Pacific Terminal Project, or GPT). The Burlington Northern Santa Fe (BNSF) main north/south track runs through and bisects Stanwood, and the proposed GPT project will significantly increase freight traffic on the BNSF track through the at-grade crossing at 271st St. that provides access to downtown Stanwood. The City has had input from local citizens and has developed further comments and requests for information to be included in the scope of the EIS.

The City requests that any environmental review carefully consider the regional impacts of this proposal beyond Whatcom County, including direct indirect and cumulative impacts to the City of Stanwood. As part of the analysis, the City believes full consideration of alternatives as well as mitigation measures to address Stanwood's identified concerns is in order.

Recent studies conducted by Gibson Traffic Consultants in the western Washington cities of Burlington, Marysville, Mt Vernon, and Stanwood identifies potentially severe vehicular traffic consequences due to the proposed increase in rail traffic intensity associated with GPT. Adverse effects to Stanwood and other cities include increased risk of accidents, impacts to the City's level of service, decreased ability to provide effective emergency response times, and possible interference with local truck freight delivery systems affecting the local economy. A memorandum by Edward Koltonowski of Gibson Traffic Consultants Inc. dated August 8, 2011 (enclosed) and presented to the City, identifies thirteen potential traffic impacts to the City. The City requests that these thirteen issues be incorporated into the EIS scope and that further information analysis, mitigation and alternatives be developed for each issue.

GPT has identified that full build out of the coal export facility would result in eighteen additional train trips through Stanwood per day; and eighteen trains per day would equate to approximately one additional coal train every 1.3 hours, all day long, in addition to existing train traffic. The City is aware that public safety could be threatened if response times for police and fire are increased due to critical access blockages caused by more frequent and

longer trains. Issues # 4, #5, and # 6 in the Gibson memorandum address this issue in greater detail. These issues are of significant concern to the City and its citizens.

In addition, the City has been made aware of potential impacts to air quality from diesel fumes, coal dust and other particulates that may be blown from open rail cars but has no way to evaluate such potential impacts.

The City requests that Whatcom County, Washington Department of Ecology and the United States Corp of Engineers include analysis of the impacts of this increased rail traffic and the impacts to air quality in the scope of the EIS and public hearings at the various stages of the EIS process. The City specifically requests that the following issues be analyzed and that appropriate mitigation and alternatives be identified.

- a. Increased traffic congestion and delays to residents and commerce including local freight delivery.
- b. Economic impacts to businesses in the Stanwood downtown as a result of traffic congestion, noise impacts, delays and the increased visual presence of trains in an area in immediate proximity to downtown.
- c. Economic impacts to residential properties located in proximity to the BNSF corridor, and in the Cedarhome Area above the tracks.
- d. Noise and vibration impacts to residential and commercial uses along the rail line within the city limits.
- e. Impacts to emergency services within Stanwood and in outlying areas including delays in service.
- f. Impacts to pedestrians using 271st St NW, Cedarhome Road and Florence Drive.
- g. Impacts to the municipal parking lot including limitations on potential future re-development of the parking lot for a mixed use project as anticipated in the Transit Overlay designation of the Stanwood Comprehensive Plan.
- h. Impacts to the rail corridor from potential flooding
- i. Delays and impacts to passenger service currently provided at the Stanwood Amtrak Station
- j. Analysis of physical impacts including increased wear and tear on the rail/street crossing at 271st St. NW.
- k. Impacts to air quality including diesel fumes and coal dust and other particulates that may be blown from open rail cars.

The City requests that the railroad provide representatives to meet periodically with local citizen groups and local government officials from Stanwood to seek mutually acceptable ways to address local concerns.

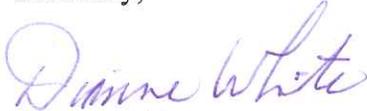
The City of Stanwood requests that the railroad identify road improvement plans for grading, widening, or otherwise providing a crossing at the 271st St NW/Cedarhome intersection that would be impacted by rail traffic increases and require the railroad to mitigate its impacts by funding the design and construction of upgrades.

As a party with known interest in this proposal, Stanwood respectfully requests that all SEPA notifications be sent to the following when SEPA notification is required under your rules:

Rebecca Lind
Community Development Director/SEPA Official for the City
10220 2780th Street NW
Stanwood, WA 98292

The City looks forward to participating in this review process. If you have any questions please contact Rebecca Lind, Community Development Director at 360629-4577; rebecca.lind@ci.stanwood.wa.us.

Sincerely,



Dianne White
Mayor

cc: Stanwood City Council
Deborah Knight, City Administrator



City of Stanwood

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Stanwood, Washington 98292
(360) 629-2181
FAX (360) 629-3009

May 14, 2012

Tyler R. Schroeder
Whatcom County Planning Supervisor/Designated SEPA Official
Planning and Development Services
Whatcom County
5280 Northwest Drive
Bellingham, WA 98226-9097

RE: Proposed Gateway Pacific Terminal Project

Dear Mr. Schroeder:

The City of Stanwood would like to request to be made a party of record on the Gateway Pacific Terminal (GPT) Project being proposed by Pacific International Terminals, Inc., through SSA Marine, to develop a multi-user import and export marina terminal for bulk, break-bulk and other marine cargoes.

As a party with a known interest in this proposal, Stanwood respectfully requests that all SEPA notifications be sent to the following when SEPA notification is required under your rules:

Rebecca Lind, Community Development Director
City of Stanwood
10220 270th Street NW
Stanwood, WA 98292

The City looks forward to participating and providing further input in this matter.

Sincerely,

Dianne W. White
Mayor

Cc: Stanwood City Council



Gibson Traffic Consultants, Inc.

Transportation Planners and Traffic Engineers

MEMORANDUM

To: Dianne White
Title: City of Stanwood Mayor
From: Edward Koltonowski
Subject: Cherry Point Coal Export Facility Rail Operations-Stanwood; GTC #11-036
Date: August 8, 2011

This memorandum is to identify some of the possible rail impacts associated with transport of coal to the proposed Cherry Point Facility on the City of Stanwood Washington. It identifies the potential impacts on the City's downtown core area, including 271st Street with its only local access to the Cedarhomes area east of the City, as well potential impacts on local employers such as Twin City foods that use bulk railway services for movement of local product.

We understand a terminal capable of exporting 54 million tons of coal per year is proposed north of Bellingham. GTC understands that the probable route of the coal delivery trains for Cherry Point would be from Wyoming/Montana, through Spokane, along the Columbia River and then up from the south from Seattle north to Bellingham and then to Cherry Point, along the Burlington Northern Santa Fe mainline. The route follows the rail tracks that run north south directly through the heart of the business district of the City of Stanwood Washington.

According to the applicant's *Project Information Document* (Feb. 2011), full buildout of the coal export facility would result in 9 full northbound trains along this line a day, which equates to 18 train trips a day, however, nothing in the project materials specifies a maximum. The 18 trains per day round trip could be increased if export capacity of the proposed port were expanded in the future. The current port proposal occupies 350 acres of a 1,000-acre site. Each train may be over 1.5 miles long, which at 60 miles per hour would mean approximately 3-4 minutes between train approach warning/gate closure and ultimate gate opening. At 10-35 miles per hour it could take approximately 6-10 minutes to clear a crossing as the siding near this area is rated for 10 mph to be improved to 35mph based on the WSDOT 2006 Stanwood station report. The 18 trains per day would equate to approximately one additional coal train every 1.3 hours, all day long, in addition to existing train traffic. Thus, train crossing delays in Stanwood can be estimated to increase with an additional train every *every 1.3 hours*, if train trips were evenly spaced throughout the day and night at between 3-4 minutes and 6-10 minutes depending on if they are having to use the siding or not.

The BNSF rail way tracks bisect the eastern residential home area of Cedarhomes and the high school from the west side of the Stanwood that includes the downtown business core. The City of Stanwood has only two east west roads connecting its downtown business core to areas of the City to the east: in this area; SR-532 that does have a grade separated crossing and 271st-Cedar Home Drive crossing which is at grade/gate controlled. Due to these constraints, our preliminary review indicated that the additional trains from the Cherry Point operations would have a potential significant impact on the commercial district and quality of life for the City of Stanwood.

The purpose of this preliminary report is to provide City staff with information that may be useful as the City prepares comments on the scope of the Cherry Point Environmental Impact Statement. We understand the City may wish to conduct additional data collection and modeling and hope that this preliminary research provides some baseline data to help understand possible impacts and the issues involved in assessing any proposed mitigation.

We have the following comments based on preliminary research:

1. The City 2008 Comprehensive Transportation Element identifies in policies such as Policy 8.1 and 8.9 the goals of connecting east and west communities and "developing a sense of community and reviving downtown." A downtown bisected by an additional 16-18 coal train trips per day through its downtown for several hours a day at up to 60 mph raises questions about the City's ability to implement that vision and adopted planning policies.
2. The City's comprehensive plan includes an "analysis of needed capacity improvements." This analysis identified the need for additional routes between the "residential area" on the hill and the low lying commercial area, and identifies the need for improvement to Cedar Home drive. The likelihood of obtaining additional rail crossings in the future would likely be complicated by the 16-18 additional trains for the Cherry Point facility.
3. Due to a speed restriction approach warning, train travel through Stanwood downtown means the barriers are down for approximately 3-4 minutes (over 200 seconds) for the larger (over one mile long) freight trains. This is the equivalent of 2-3 continuous red lights cycles in a row for a normal signal on 271st NW. The Institute of Traffic Engineers identifies an average delay of over 80 seconds as level of service F - the City's standard for normal roadway operation is LOS D, i.e. allowing only 60 seconds as the worst delay for normal conditions. The addition of 16-18 trains per day would call into question whether the City can maintain its adopted LOS D standard.
4. With the increase in number of long coal trains across 271st grade crossing, the only alternative east-west for local traffic is the regional SR-532 grade separated crossing as the "local" east west route becomes degraded with the increase coal trains. This is a particular issue during summer peaks as SR-532 already reaches capacity limits.
5. There is a probable issue concerning emergency services response times, in a scenario where SR-532 is closed due to an accident/obstruction or peak summer traffic and the only east-west crossing between the business district to the west and the residential area to the east is dependent on the Cedar Home/271st crossing being unobstructed. In the event a mile and a half long train is stopped or moving slowly past this point, emergency response times could be delayed until the crossing is cleared. Adding 16-18 additional trains per day to service Cherry Point could tip the balance at a critical time when emergency responses are needed.
6. Within the last 5 years there have been 3 accidents at the Cedar Home drive/271st crossing two of which included an injury. Two included other motor vehicles at the crossing, not actual trains, but one included a train striking and injuring a pedestrian crossing the tracks. Additionally within the approach roads to Stanwood there were three accidents recorded at the Old Pacific Highway crossing just to the north that included collisions with the guard rail. To the south, the minor 48th Avenue crossing in the County recorded two accidents both of which involved trains and crossing vehicles.
7. Already today the presence of a long freight train during the peak hours creates separation in the downtown core. The City's comprehensive plan identified that 271st St NW in the downtown core carried approximately 16,000 vehicles a day and states that growth is going to come from the increased in City residential development. This means those areas primarily east of the tracks thus even greater future demands on 271st can be anticipated. Any environmental review of rail line impacts should study this current condition and likely increased impact, including costs to mitigate the effects. One form of mitigation is to create grade-separation, with either a tunnel or a bridge. The City may wish to request that mitigation as part of the environmental review process for Cherry Point.
8. It should also be recognized that the rail tracks also cross the City's primary access to the north from the west side for the City (Old Pacific Highway). Old Pacific highway north of the City carries over 5,000 daily trips near the crossing point.

9. The City of Stanwood and state have recently invested heavily in establishing the Stanwood station and improved passenger train (AMTRAK) services for the north end. Freight traffic on the single rail line north of Everett is expected to double with the Cherry Point proposal. Under BNSF's policy, it is our understanding that freight deliveries are not scheduled to the same on time reliability demands of passenger trains but can still take precedence over passenger rail under certain circumstances. The City may wish to analyze the degree to which a doubling of freight traffic is expected to adversely affect the reliability of existing passenger rail schedules and also whether it will diminish opportunities to expand passenger rail. In 2001, the City participated in a state-sponsored study of the potential for passenger rail expansion, titled: *Pacific Northwest Rail Corridor: Everett to Blaine Commuter Rail Preliminary Feasibility Study*. On Page IV of the Executive Summary, the report concludes that there may be a viable market for commuter rail north of Everett by the year 2030. In 2004 the North Sound Regional Study conducted by Cascadia for Whatcom Council of Governments identified again the potential of significant rail capacity issues identified by BNSF. The City may wish to comment on whether the Cherry Point proposal affects the conclusions in those studies.

10. The States 2006 "statewide *Rail Capacity and System Needs* study" identifies the 1st issue as follows:

The Railroads Are Focusing on High-Volume and Long-Haul Services, But the State's Industrial and Agricultural Shippers Also Need Low Volume and Short-Haul Services.

Long-haul intermodal container trains and long-haul unit grain trains moving to and from Washington State's ports are the least complex and the most profitable for the Class I railroads to operate. As a result, the railroads have reoriented their operations to accommodate this business. But many Washington State shippers are low-volume carload shippers who generate only a few dozen carloads a week or a month, and they are being priced out of the rail market.

So a key question may be whether this interstate traffic from the coal trains will have the impact of reducing the availability of local rail spur business necessary to serve Stanwood businesses such as Twin City Foods. These issues can be analyzed as part of the economic impact analysis we understand must be completed as part of the environmental review for the project.

11. The Washington State 2010-2030 Freight Rail Plan published by WSDOT in December 2009 identified that the rail line through Stanwood in 2008 capacity was already at its capacity of 18 trains per day (Exhibit 3-9). The state plan shows that it hopes to increase that capacity to 30 trains per day; however the design and cost of the specific improvements needed to do that have not been identified. Additional study and inquiry should be conducted to determine whether federal or state funding is committed to expand the capacity of the BNSF freight system, sufficient to allow the projected additional 16-18 trains per day and still leave adequate capacity for local freight and future commuter services.
12. The Cherry Point applicant argues that the coal train activity will only bring train activity back up to the level it was before the economic recession of 2007/2008, and therefore there is no impact. In our judgment, this conclusion is not supportable, because as soon as the economic recovery really starts to take hold, those previous train activities will also pick up, as well vehicular traffic on the roads. At that point, even greater impacts will begin to accumulate. Additional work is needed to obtain reliable information concerning pre-recession and historic train levels, the length of trains and delay times. Reliable projections of train and road traffic during economic recovery are critical to obtaining realistic estimates of delays and impacts. Assumptions from the past should be regarded critically.
13. Train delays at crossings are often eliminated by constructing grade separation, which allows traffic to pass over or under railroad tracks. While grade separation is desirable particularly because of the already complicated Pioneer/Cedar Drive intersections and the new Stanwood AMTRAK station,

these improvements are typically multi-million dollar solutions and funding is not yet planned. Estimates of this mitigation may be obtained by the City, in conjunction with estimates of similar improvements to be requested by other cities, counties and WSDOT. It is our understanding, for example, that replacement of the Skagit River Bridge may be necessary to support the proposed heavy coal rail increases. The budget for design and construction of that improvement alone may be half a billion dollars.

This analysis of possible rail line impacts associated with the increase of 18 trains per day serving the Cherry Point Coal export facility is preliminary and is intended to illustrate some of the potential problems and areas deserving detailed study during the SEPA review for the facility. This preliminary analysis suggests potentially severe consequences for the City's transportation plan and improvements, with increases in risk of accidents, impacts to the City's levels of service, ability to provide effective emergency response times, and possible interference with local freight delivery systems important to the City's economic recovery.