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Secretary of Transportation

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January 11, 2013

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

RE: Gateway Pacific Terminal Environmental Impact Statement (EIS) Scoping  
Comments

Dear Co-Leads:

Thank you for providing the Washington State Department of Transportation (WSDOT) with this opportunity to comment on the scope of the Gateway Pacific Terminal (GPT) Environmental Impact Statement (EIS). WSDOT's responsibility to Washington's citizens is to provide a safe and efficient transportation system that supports our economy, communities and the environment. It is essential for my agency to ensure that proposed actions that can adversely impact this mission are carefully assessed to identify conflicts and necessary mitigation strategies.

With respect to the GPT proposal, WSDOT's comments focus on potential impacts from increased rail traffic to state highway and ferry systems, the state's freight rail system, and passenger rail service. In addition, our comments address impacts to SR 548 in Whatcom County.

As a general comment, it will be important for the EIS to evaluate the cumulative effects to the state's transportation system of this proposal in light of other similar proposals. Also, in addition to the specific transportation related impacts discussed below, it will be important to identify and evaluate potential economic benefits and impacts of the GPT project within the state in order to comprehensively understand project implications. WSDOT suggests that the EIS assess economic benefits and impacts of the GPT project to local and state economies.

#### **Clarification of Train Traffic**

GPT project documents estimate that full project build-out would add up to 18 trains (nine loaded + nine empty trains) within the state each day, including unit trains exceeding 8,000 feet in length. It is unclear whether all nine GPT-bound trains will be long unit trains, or whether some trains (*e.g.*, those carrying commodities other than coal) would be shorter. GPT would also be equipped to receive goods, and it is not clear how imports will be transported for distribution. The EIS should clarify whether all GPT-bound trains would be long unit trains, and analyze the transportation implications of imports received at the GPT site.

### **Site Transportation Impacts**

WSDOT requests a Traffic Impact Analysis (TIA) be done to disclose the transportation construction impacts on the local and state highway systems and ongoing traffic impacts after the GPT is in full operation. The TIA typically includes:

- Vehicular trips (trip generation & distribution on the transportation network)
- Level of Service thresholds
- Channelization thresholds
- Safety thresholds

### **State Highway System**

Actual train routes for GPT-related trains along Burlington Northern Santa Fe Railway (BNSF) main lines have not been specified; however, these comments are based on a scenario where GPT trains would travel along the following BNSF railroad subdivisions within Washington: Kootenai River, Spokane, Lakeside, Fallbridge, Seattle, Scenic, Bellingham, and Cherry Point. This assumption is intended to identify the locations of possible impacts to the state highway system if any of these routes are used. Other state highways may be impacted and should be similarly assessed if alternate routes are chosen by BNSF.

WSDOT has identified 12 state highway-railroad grade crossings along the above-listed routes between Spokane and the GPT site, as well as an additional 17 highway intersections and interchanges where operations may be impacted due to delays at nearby highway-railroad grade crossings. Many of these locations already experience some delays under existing train volumes and may not be able to adequately absorb additional delays without mitigation measures. A list of these locations is attached.

WSDOT requests that the EIS include an analysis of how these locations would be affected by the projected increase in rail traffic, or, if other railway routes are contemplated, how state highways situated along those routes would be affected. As indicated above, WSDOT is not only interested in impacts to state highway railroad grade crossings, but also how increased delays at railroad grade crossings situated near state highway intersections and interchanges may impact those state highways. This analysis should include impacts to:

- Levels of service at affected state highway intersections/interchanges;
- Vehicle delay and queuing at state highway grade crossings and state highways impacted by local agency grade crossings;
- Emergency response capabilities; and
- Highway-rail grade crossing safety (*i.e.*, whether modification of warning devices or grade separation might be warranted with the projected increase in rail traffic).

In light of the projected 28% growth to the state's population over the next decade<sup>1</sup>, likely increases in traffic volumes along affected state highways should be factored into the assessment.

The EIS should identify and examine strategies to mitigate any adverse impacts from added GPT-related train traffic on state highways. This should include estimating the cost of implementing those strategies, determining whether public investment would be required, and examining alternate train routes (or combinations of routes) that may result in fewer or less severe impacts to the state highway system.

### **Washington State Ferries**

The Washington State Ferries (WSF) system is an integral part of the state's intermodal transportation network and provides significant economic benefit to the region. The ability of WSF to effectively operate is dependent on available connections with state highways to facilitate on and off loading according to schedules based on transportation demand. The scope of the EIS should include WSF's operational capabilities at the Edmonds Ferry Terminal and marine traffic operations in the San Juan Straits as described below.

### **Edmonds Terminal**

Edmonds Terminal is one of the busiest terminals in the WSF system with 23 daily sailings. It serves over four million passengers per year, many as daily commuters, and two million vehicles per year between Edmonds and Kingston. Significantly, the Edmonds ferry route also serves as a connector route to state truck freight economic corridors due to restrictions on truck traffic and hazardous loads within Seattle tunnels and downtown areas and the presence of agricultural processing centers on the Olympic Peninsula.

At Edmonds, the BNSF Scenic Subdivision tracks are located within 20 feet of the entrance to the Edmonds Terminal used by vehicles to access and unload from WSF vessels via SR-104. Operational challenges at Edmonds Terminal exist even today as a result of vehicle delays from current train volumes through the SR-104 railroad grade crossing. WSF has recently had to eliminate two sailings per day to maintain on-time ferry schedules in response to disruptions resulting from train related delays at the SR-104 crossing.

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<sup>1</sup> Governor Chris Gregoire, 2013 Policy Brief - Building a Better Future: Investing in Washington's Transportation System, December 2012

The SR-104 railroad grade crossing is included on the attached list of potential impacts to state highways. In addition to analyzing the highway impacts at the SR-104 crossing specified in the preceding section titled "State Highway System", the EIS should include an analysis of the impacts of increased GPT-related train traffic to:

- Ferry schedules and operations at Edmonds Terminal, including how impacts to operations at the terminal would result in further impacts at intermodal connections;
- Vehicle waiting times, including impacts to freight transporters that depend on ferry services; and
- Emergency services (WSF vessels provide critical emergency service transportation for ambulances, especially when weather conditions prevent use of aircraft for certain service areas).

The EIS should examine the alternatives to mitigate any effects of increased train traffic, including cost and the feasibility of the mitigation proposed. Alternatives to consider include, but may not be limited to:

- Relocation of Edmonds Terminal to Point Edwards with a separated grade crossing;
- Grade separation at the current terminal site; and
- Train traffic restrictions during the busiest ferry travel times (*i.e.*, commute, recreational, and weekend traffic peaks).

#### **Marine Traffic in San Juan Straits**

GPT-bound marine vessels would sail to and from Cherry Point through either Rosario Straits or Haro Straits. In addition to other passenger vessel traffic that crosses these straits, WSF sails approximately 900 times per year across Haro Straits between Friday Harbor and Sidney, British Columbia, and approximately 12,000 times per year across Rosario Straits between Anacortes and the San Juan Islands. WSDOT understands that one of the commitments from the GPT project proponents is to complete a Vessel Traffic and Risk Assessment Study for these waters. The EIS should ensure that this study includes analysis of the following areas:

- The extent that probability of collisions between passenger vessels (both WSF and other passenger vessels) and cargo vessels would increase due to additional GPT-related marine traffic;
- Assessment of whether existing rapid/emergency response capabilities are adequate to effectively respond to a range of incidents, including high severity collisions (in terms of both human and environmental protection);
- Whether the GPT project would require additional safety and environmental protection measures; and
- The costs involved to adopt additional measures to mitigate risks related to safety and environmental protection - including an assessment of whether implementation would require public investment.

### **Freight System Impacts**

The economic vitality of Washington requires a strong freight rail system capable of providing its ports, farms and businesses competitive access to North American as well as international markets.

According to Surface Transportation Board Waybill data, the Class I freight rail system in Washington transported 115.8 million tons of cargo in 2010. The GPT project will have an initial capacity of 28 million tons of coal and a maximum capacity of 54 million tons. This represents a potential increase in tonnage moving on the Washington freight rail system of 24% initially and 46% when the terminal is functioning at maximum capacity (in 2010 numbers).

The GPT project will increase freight rail jobs in Washington but may also increase the risk of capacity constraints and bottlenecks and inhibit rail system accessibility to some customers. WSDOT recommends that an evaluation of future capacity constraints, bottlenecks and rail system accessibility in Washington be included in the EIS. The EIS should include a detailed operations and capital needs assessment by BNSF to address future bottlenecks and capacity constraints. The assessment should be robust enough to address capacity needs when the GPT is operational at half-capacity (8-10 round trip trains) as well as at maximum capacity (18 round trip trains). Particular attention should be given to how the BNSF will ensure adequate accessibility to the rail system for future growth in agriculture, container and other general merchandise train traffic.

BNSF should address other potential operational changes that could impact capacity. These may include: directional running (*e.g.*, all westbound traffic uses the BNSF Fallbridge Subdivision), train fleeting (*i.e.*, running multiple trains in a single direction, reducing the need to plan train meets), expected impacts of Positive Train Control, mudslide mitigation and resiliency planning, increased speed limits, increased train lengths and the use of distributed power (*i.e.*, locomotives placed in the middle or at the end of trains).

As mentioned above, BNSF should provide a list of preferred capital improvements that address expected bottlenecks and other capital constraints. This list could include the following: new train passing sidings or siding extensions, additional sections of double or triple track, additional storage-in-transit or other yard track.

Finally, the assessment should cover all rail line segments in Washington that have the potential to be affected by the GPT project.

### **Amtrak Cascades Intercity Passenger Rail Service**

The Pacific Northwest High Speed Rail Corridor is one of ten corridors designated by the U.S. Department of Transportation for high-speed intercity passenger rail service. The service has been an increasingly strong component of the Pacific Northwest's intermodal transportation system since the Amtrak Cascades' inaugural run in 1994. In its 19 years

of operation, the service has increased the number of daily trains to 11; extended its geographic reach from Eugene, Oregon to Vancouver, British Columbia; and grown the annual ridership from 180,209 in 1994 to nearly 850,000 in 2011.

The states of Washington and Oregon, Amtrak, and passengers pay for the Amtrak Cascades service. The United States and Canada pay for border security. The trains run on rail lines privately owned by BNSF and Union Pacific Railroad.

WSDOT has secured nearly \$800 million in federal funding for a series of projects that will increase service reliability and add two Amtrak Cascades round trips between Seattle and Portland, for a total of six, by 2017. Although there has been much speculation regarding the potential for additional GPT rail traffic to adversely impact the agency's passenger rail program, WSDOT remains confident that BNSF will continue to meet current and scheduled passenger-rail service commitments that start in 2017 due to federal railroad infrastructure investments.

While WSDOT's agreements with BNSF ensure specific service outcomes for the funded improvements described above, we suggest that impacts to future passenger rail service beyond 2017 (delays, service interruptions, etc.) be identified and considered so that they can be avoided and/or mitigated by BNSF and other parties working to see successful, complementary freight and passenger uses of limited rail resources. Accordingly, the scope of the GPT EIS should address potential impacts to service planned for the future, as outlined in the 2006 *Long-Range Plan for Amtrak Cascades*. The plan identifies the following service improvements by 2023, not currently funded:

- Additional 7 roundtrips between Seattle and Portland, Oregon, for a total of 13
- Additional 2 roundtrips between Seattle and Vancouver, British Columbia, for a total of 4
- Total travel time of 5 hours, 22 minutes between Vancouver, B.C. and Portland, OR

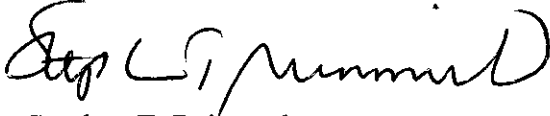
#### **SR 548 Impacts**

Another potential area of concern regarding the GPT project is site specific work associated with the materials handling and storage yard at the BNSF Cherry Point spur. As currently proposed, it appears that the development of this site will impact an existing WSDOT wetland mitigation site, currently being used to fulfill compensatory wetland mitigation requirements. Furthermore, site and track improvements adjacent to the site are likely to affect localized flooding. Changes to the hydrology at this location could compromise adjacent SR 548 operations by increasing the likelihood of roadway flooding during extreme rain events.

The EIS should analyze GPT project impacts to the WSDOT wetland mitigation site and hydrologic impacts to SR 548, as well as identify appropriate mitigation to offset any impacts to these areas.

Thank you for the opportunity to comment on this proposal. We look forward to working with the NEPA lead agencies in addressing our comments in the EIS. Please contact me at (360) 705-7027 or Megan White at (360) 705-7480 if you have any questions or would like to discuss any of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen T. Reinmuth". The signature is fluid and cursive, with the first name "Stephen" being the most prominent.

Stephen T. Reinmuth  
Chief of Staff

SR:jaa  
Attachment

cc: Jerry Lenzi, WSDOT  
Megan White, WSDOT

## **Attachment to WSDOT EIS Scoping Comments on the Gateway Pacific Terminal Project**

### **State highway railroad grade crossings and potentially impacted intersections/interchanges along possible GPT-bound train routes**

#### **BNSF Kootenai Subdivision**

State highway grade crossings:

- SR 27 Pines Road (USDOT 066367E) – Spokane Valley

SR 290 closely parallels this rail line, creating the potential for delays at adjacent at-grade railroad crossings to impact SR 290 operations and levels of service. Crossings in this category include:<sup>1</sup>

- Idaho Road Spokane County (USDOT 066236B)
- McKinzie Road, Spokane County (USDOT 066239W)
- Harvard Road, Spokane Valley (USDOT 066240R)
- Barker Road, Spokane Valley (USDOT 066244T)
- Flora Road, Spokane Valley (USDOT 066245A)
- SR 27 Pines Road, Spokane Valley (USDOT 066367E)
- University Avenue, Spokane (USDOT 066371U)
- Park Road Spokane, (USDOT 066377K)

#### **BNSF Spokane Subdivision**

No state highway grade crossings identified

#### **BNSF Lakeside Subdivision (Spokane to Pasco)**

No state highway grade crossing identified

#### **BNSF Fallbridge Subdivision (Pasco to Vancouver, WA)**

There are no state highway grade crossings identified. However, portions of SR 14 closely parallel the rail line creating the potential for delays at adjacent at-grade railroad crossings to impact SR 14 operations and levels of service. In particular, increased vehicle delays at the Maple Street railroad grade crossing in Bingen, Washington (USDOT 090169V), which provides access to the Port of Klickitat, could back up traffic onto SR-14 and result in operational and/or safety-related impacts.

#### **BNSF Seattle Subdivision (Vancouver, WA to Seattle)**

State highway grade crossings

- SR 506 7<sup>th</sup> Street, Vader (USDOT 092484T)
- SR 505 Walnut Street, Winlock (USDOT 092493S)
- SR 516 Willis Street, Kent (USDOT 085640K)

#### **BNSF Scenic Subdivision (Seattle to Everett)**

State highway grade crossings

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<sup>1</sup> Level of service and control delay/vehicle analysis for the intersections of these roadways with SR 290 (Existing/2030 No Action) was completed for the 2006 Bridging the Valley DCE, and is available upon request.



- SR-104 Main Street, Edmonds (USDOT 085445K) *\*Serving the WSF Edmonds Ferry Terminal*

**BNSF Bellingham Subdivision (Everett to Canadian border)**

State highway grade crossings

- SR 528 4<sup>th</sup> Ave, Marysville (USDOT 084640G)
- SR 531 172<sup>nd</sup> Street, Snohomish County (USDOT 084669E)
- SR 536 Kincaid Street, Mount Vernon (USDOT 084744N)
- SR 538 College Way, Mount Vernon (USDOT 084759D)
- SR 20 Avon Street, Burlington (USDOT 084766N)
- SR 548 Grandview Road, Whatcom County (USDOT 084841X)

This line segment runs parallel with Interstate 5, and intersects with local agency roadways nearby several I-5 interchanges. I-5 interchanges of concern and the corresponding at-grade crossings that may impact these interchanges include:

- I-5/ SR 528 4<sup>th</sup> Ave, Marysville (exit 199)
  - SR 528 4<sup>th</sup> Ave grade crossing (USDOT 084640G)
- I-5/88<sup>th</sup> Street NE, Marysville (exit 200)
  - 88<sup>th</sup> Street NE grade crossing (USDOT 084650M)
- I-5/116<sup>th</sup> Street NE, Marysville (exit 202)
  - 116<sup>th</sup> Street grade crossing (USDOT 084654P)
- I-5/SR 536/Kincaid Street, Mount Vernon (exit 226)
  - SR 536 Kincaid Street grade crossing (USDOT 084744N)
- I-5/SR 538 College Way and I-5 SR 538 (exit 227)
  - SR 538 College Way grade crossing (USDOT 084759D)
- I-5/Cook Road, Skagit County (exit 232)
  - Cook Road grade crossing (USDOT 084775M)
- I-5/ SR 532 Grandview Road, Whatcom County (exit 266)
  - SR 548 Grandview Road grade crossing (USDOT 084841X)
- I-5/Birch Bay-Lynden, Whatcom County (exit 270)
  - Birch Bay-Lynden grade crossing (USDOT 084845A) *\*the interchange is located north of the Cherry Point Spur turnout, but may be impacted depending on whether related train operations would impact the crossing.*

**BNSF Cherry Point Subdivision (mainline to GPT project site)**

State highway grade crossings

- SR 548 Grandview Road, Whatcom County (USDOT 096133H)