



CITY OF BLAINE

COMMUNITY DEVELOPMENT SERVICES DEPARTMENT

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MEMORANDUM

Date: November 8, 2012

To: Whatcom County PDS
Washington State Department of Ecology
US Army Corps of Engineers

From: Michael Jones, City of Blaine SEPA Official

Cc: Mike Haslip, City of Blaine Public Safety Director

Re: **Gateway Pacific Terminal**

Thank you for the opportunity to participate in the scoping process. I have limited my comments to issues I believe directly impact the City of Blaine. The proposed project has the potential to have dramatic impact on the City of Blaine. Some of those will likely be positive and some will likely be negative.

I believe the most significant factor affecting how the City is impacted is the change in rail traffic, both frequency of trains and changes in traffic patterns. The terminal may dramatically change the number of trains that pass through Blaine. Currently numerous trains pass through the City on the way to the Robert's Bank terminal in Tsawwassen, BC.

The City wishes to ensure that any study of rail traffic considers the tracks north of the proposed terminal and not just south and east towards the US interior. The Canadian interior is a potential market and supply area for goods moving through the terminal. The terminal could divert many of the trains currently moving through Blaine as they will no longer need to access the Robert's Bank terminal.

My comments are summarized in the table below.

Issue	NEPA/SEPA Element	Mitigation to Consider
Increased frequency of blockage at the Blaine Road rail crossing	Traffic Traffic delays caused by the train can be potentially significant, especially at peak traffic times	Move the VACIS further south to allow delayed trains to sit on tracks that do not include at grade crossings
Traffic delays caused by trains in Blaine are unique. Southbound trains move very slowly. The		Signalize the intersection so

<p>typical time for a crossing does not apply for southbound trains. The VACIS inspection facility causes 11-12 minute crossing closures, which generates 15-20 minute traffic delays for each train that goes south through town.</p> <p>This is a problem at all crossing, but is particularly difficult at the Bell Road/Blaine Road crossing at the south end of town.</p>	<p>Economic Conditions Traffic delays impact commerce that pass through the intersection and make the surrounding commercially zoned properties less desirable for development.</p>	<p>that traffic can move more efficiently through the intersection after trains clear, and can move more efficiently on the three unblocked legs of the intersection when the train is blocking traffic</p> <p>Install ITS motorist signage to inform all drivers of the delays –or – install sensing equipment connected to emergency services dispatch so service providers know they need to avoid the area and use a detour</p> <p>Build an overpass so Blaine Road is not blocked by trains</p>
	<p>Public Safety The train blocks emergency response for police, EMS, and fire. The traffic delays exacerbate the problem because narrow roads and stopped traffic make it difficult and dangerous for emergency vehicles to push through even after the train clears.</p>	
	<p>Environmental Justice /Social Conditions</p> <p>Numerous school busses use this crossing and delays affect students' arrival at school. Impacts to students include late arrival to class and students on free and reduced cost meal programs are required to take breakfast to class with them.</p>	
<p>Increased frequency of blockage at the Marine Drive rail crossing</p> <p>The traffic delays at the Marine Drive crossing are not as long as those at Blaine Road because it is approximately one mile further north and not as adversely impacted by the VACIS facility</p>	<p>Traffic Increased frequency of closures could lead to significant traffic delays that could extend to the adjacent I-5 interchange and impact freeway traffic.</p>	<p>Develop a facility or program/policy that allows open communication between BNSF and emergency services (WhatComm connection to BNSF) that is effective and ensures communications so that in emergencies there is a chance to have trains move when blocking the road (or stop before blocking)</p> <p>Build an overpass so Marine Drive is not blocked</p>
	<p>Social and Economic Conditions The marina and port industries are significant economic drivers in Blaine traffic delays adversely impact these industries and they are very susceptible to disaster, fire, injury, drowning, and fuel spills which are exacerbated by more frequent closures.</p>	

	<p>Public Safety Marine Drive accesses a peninsula of land isolated by the BNSF tracks. The area contains a marina, industrial area and the City wastewater treatment facility. Closures that prevent emergency service providers from accessing the Marine Drive peninsula increase the risk of sewage spills and extreme fire events due to lack of response access. Numerous events or incidents can be significantly worsened by a lack of emergency response.</p>	
<p>Increased frequency of blockage at the Hughes Avenue rail crossing</p>	<p>Public Safety Hughes avenue accesses a “dead end” neighborhood. All access requires crossing the railroad. The area contains many homes. Closures that prevent emergency service providers from accessing the area increase the risk of extreme fire events due to lack of response access. Numerous injuries or incidents can be significantly worsened by a lack of emergency response.</p>	<p>Develop an alternate for Hughes Avenue (an emergency service road)</p> <p>Install wayside horns to reduce noise impacts</p>
	<p>Noise More frequent trains add to noise impacts in the residential neighborhood.</p>	
<p>Increased use of sidings Added train traffic may increase the use of sidings throughout the rail system</p>	<p>Public Safety Use of the rail siding in downtown Blaine for cargo storage could result in catastrophic release of chemicals or catastrophic explosion</p>	<p>Install an AHAB (all hazards alert broadcast) public notification system to warn the public of hazardous release</p> <p>Implement policies that ensure that hazardous materials are not store on the downtown Blaine crossing</p> <p>Implement a policy that requires that engines are turned off when trains a delayed for extended periods of time</p> <p>Trains switching should be limited and should be avoided or eliminated at night</p>
	<p>Noise Train switching is noisy and occurs at all hours. Trains will occasionally idle for extended periods of time (several hours to multiple days) causing noise impacts</p>	
	<p>Air Quality Idling trains adversely impact air quality</p>	

<p>Temporary Population Construction crews will move to the area to build the facilities. They will need services and will generate adverse impacts on local communities</p>	<p>Social and Economic Conditions All criminal justice costs are likely to increase in local communities. The County, as the jurisdiction with tax collection authority over the site, will have revenues to offset impacts. Local communities (Ferndale and Blaine) will not have property tax revenues from the site.</p>	<p>Consider cash payment to offset expenses to city and tax revenue sharing with local communities</p>
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