

Appendix A

Comment Letters and Responses on the Tier-1 EA



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501

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(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

October 13, 2009

Ms Elizabeth Phinney
Department Of Transportation, Rail Environmental Coordinator
PO Box 47300
Olympia, WA 98504-7300

In future correspondence please refer to:

Log: 101309-14-FRA

Re: Pacific NW Rail Corridor Program Environmental Assessment

Dear Ms Phinney:

Thank you for providing a copy of the above referenced document to the Washington State Department of Archaeology and Historic Preservation (DAHP). This Environmental Assessment (EA) supports Washington State Department of Transportation (WSDOT) efforts to increase funding for Amtrak Cascades intercity passenger rail service through nine western Washington counties. In response, I have reviewed the EA to assess the affect of the rail service improvements to significant cultural resources along the corridor.

As a result of my review, I concur with the conclusions and recommendations of the EA as they pertain to cultural resources along the corridor. I understand that in accord with Section 106 of the National Historic Preservation Act, project specific cultural resource investigations will be conducted in association with each project to determine if cultural resources will be affected by the construction and operation of additional passenger rail service. In addition, WSDOT will consult with affected Native American Tribes, the State Historic Preservation Office (SHPO), the federal Advisory Council on Historic Preservation (ACHP), and the federal lead agency to avoid, minimize, or mitigate project impacts to identified significant cultural resources.

These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Please contact me should you have any specific questions about our request and we look forward to consulting with you on specific project proposals.

Please note that DAHP requires that all historic property inventory and archaeological site forms be provided to our office electronically. If you have not registered for a copy of the database, please log onto our website at www.dahp.wa.gov and go to the Survey/Inventory page for more information and a registration form. To assist you in conducting a survey, DAHP has developed a set of cultural resource reporting guidelines. You can obtain a copy from our website. Finally, please note that effective Nov. 2, 2009, DAHP requires that all cultural resource reports be submitted in PDF format on a labeled CD along

with an unbound paper copy. For further information please go to
http://www.dahp.wa.gov/documents/CR_ReportPDF_Requirement.pdf.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me at 360-586-3073 or greg.griffith@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

October 23, 2009

Ms. Elizabeth Phinney
Washington State Department of Transportation
State Rail and Marine Office
P.O. Box 47407
Olympia, Washington 98504-7407

Re: **Pacific Northwest Rail Corridor Program Environmental Assessment (EA)**
EPA Project Number: 09-063-FRA

Dear Ms. Phinney:

The U.S. Environmental Protection Agency has reviewed the Pacific Northwest Rail Corridor Program Environmental Assessment (EA). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We find that the EA is well presented and readable and commend Federal Railroad Administration (FRA) and Washington State Department of Transportation (WSDOT) for their efforts to produce it. We also appreciate having the opportunity to review it, even though the timeframe for doing so is unusually brief. Our hope is that there will be opportunity for continuing dialogue to ensure the proposed new railway infrastructure is designed and constructed in harmony with the natural and human environment.

The EA rightly states (p. 5-8) that the potential operational impacts resulting from faster and more frequent trains would be increased train/wildlife collisions. The Biological Resources/Ecology section of the EA does discuss appropriate mitigation measures for impacts to wetlands, vegetation, fish habitat, etc. However, we are concerned that the EA includes no potential mitigation for the train/wildlife collisions. Over the past 20 years there has been a substantial increase in the level of knowledge, awareness, and action to address the habitat fragmentation effects and wildlife mortality associated with roadways. Trains and railways also cause substantial wildlife mortality, which in some circumstances may rival those caused by roadways.

Highway-wildlife interaction studies show that roadways and vehicular traffic cause substantial road avoidance behavior in wildlife as well as road mortality. Study results of railway-wildlife interactions differ in that railways often tend to attract wildlife. For example, spilled grain from freight trains provides an attractive food source for wildlife. Animals killed by trains while feeding become a food source for other animals, which may also be killed by trains. When trains are not present, railways also provide a relatively convenient travel corridor for animals, particularly where railway bridges, trestles, or tunnels facilitate movement across

challenging topography, such as, deep ravines, canyons, mountains, and water bodies and/or where the railway provides a cleared pathway, such as, through dense vegetation or deep snow. Rather than creating a movement barrier in the landscape, railways can become an attractant and mortality sink.

Recommendation: Collaborate with federal and state wildlife agencies to identify means to mitigate railway/wildlife impacts. We recommend information gathering to inform this process, and that mitigation include appropriate siting, design, and construction of effective wildlife crossings and associated fencing to direct animals to safe crossing locations. Suitable locations would likely include, but not necessarily be limited to areas such as, wetlands, stream/riparian corridors, forest and agricultural land interface areas, migration corridors, and so on. Where bridges or large culverts are installed for aquatic features, these could be enlarged to span upland habitats as well to facilitate movement of terrestrial species.

Thank you for the opportunity to review and comment on the PNW Rail Corridor Program. We would also like to review the environmental analyses for the individual Service Block groups of proposed projects as they become available. If you have questions or would like to discuss these comments, please contact Elaine Somers of my staff at (206) 553-2966 or at somers.elaine@epa.gov.

Sincerely,

/s/

Teresa Kubo, Acting Manager
Environmental Review and Sediment
Management Unit



Washington State
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Paula J. Hammond, P.E.
Secretary of Transportation

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October 23, 2009

Ms. Teresa Kubo, Acting Manager
Environmental Review and Sediment Management Unit
U. S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

**Subject: Response to the U. S. Environmental Protection Agency comments on the
Pacific Northwest Rail Corridor Program Environmental Assessment**

Dear Ms. Kubo:

Thank you for your letter of October 23, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

We very much appreciate the information that you provided about train/wildlife interactions, particularly in comparison to highway/wildlife interactions.

If funding is provided for intercity passenger rail service expansion, please be assured that when we move forward with project-level documentation, we will work with federal and state wildlife agencies to identify means to mitigate railway/wildlife impacts. We will also include your agency in the review of the environmental analyses for individual projects.

We look forward to working with your staff in the future.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Phinney".

Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

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State of Washington
DEPARTMENT OF FISH AND WILDLIFE
600 Capitol Way N - Olympia, Washington 98501 - (360) 902-2598

October 16, 2009

Washington Department of Transportation
State Rail and Marine Office
ATTENTION: Elizabeth Phinney
310 Maple Park Ave SE
PO Box 47300
Olympia, WA 98504-7300

Dear Ms. Phinney

**SUBJECT: Pacific Northwest Rail Corridor Program Environmental Assessment;
WSDOT – Federal Rail Administration Proponent, BNSF Railway north-
south mainline from Vancouver, WA to Blaine, WA.**

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced National Environmental Policy Act (NEPA) document received on October 8, 2009, and offers the following comments at this time. Other comments may be offered as the project progresses.

WDFW appreciates WSDOT's commitment to construct hydraulic projects in accordance with WDFW regulations (EA p.5-10). It is WDFW's understanding that the May, 2008 MOA would be applicable to this project because the MOA covers all WSDOT programs.

On page 7-3 of the EA document it references a WDFW Catalog of Washington Streams and Salmon Utilization (Volumes 1 and 2) from 1975. This information is outdated and greatly underestimates the number of fish bearing waters. We encourage WSDOT to use the most recent fish utilization information available such as the WDFW GIS database. It is unclear if "Table 11. Miles of fish designated critical habitat located within 1,000 feet of the rail corridor" (EA p.5-7) was based on this outdated information or not. If so, then this table may underestimate the potential impacts to fish bearing waters. WDFW is also concerned that only five species of fish were addressed. The Hydraulic Code requires the proponent to provide for the protection of "fish life" which means all fish species, including but not limited to fresh and salt water food fish, shellfish, game fish, and other nonclassified fish species and all stages of development of those species.

WDFW is concerned that the emphasis on avoiding impacts may not recognize that this will result in adverse impacts to fish. WDFW does not concur with the conclusion that there are no impacts from the "No Build Alternative" in the Biological Resources/Ecology portion of the EA (p.5-7). Maintaining an existing fish blockage is maintaining an adverse impact. The No Build Alternative will continue these ongoing adverse impacts resulting in continued mortality and/or

lost habitat opportunities, decreased productivity of fish for both human use and as a critical component of the food chain and ecosystem. In addition to impacts caused by maintaining existing water crossing barriers, other projects that may have adverse impacts on fish under the No Build Alternative include, but are not limited to, maintenance of marine and freshwater rip rap, bulkheads, bridge repair, and gravel or large woody material removal.

Although WDFW has not conducted a comprehensive survey of BNSF water crossing structures, the WDFW TAPPS database has identified 61 culverts that are a barrier to 200 or more meters of fish habitat at each of these crossings. WDFW requests the proponent inventory their water crossing structures and replace them with stream simulation culverts or bridges as appropriate per RCW 77.57.030.

The EA (p.5-7) identifies “potential permanent impacts” to critical, suitable or available habitat as a result of the corridor service expansion alternative. These impacts include potential loss or modification of habitat for fish and wildlife species. We encourage the proponent to engage WDFW early in the process to identify opportunities to avoid, minimize, mitigate or compensate for these unavoidable permanent impacts.

WDFW is concerned that a high speed train is likely to result in increased mortality to wildlife species as the opportunity for more frequent train/wildlife collisions would be expected to occur as a result of the operational impacts upon completion of the project. The EA (p.5-8) states that the current rate of train/wildlife collision “occurs infrequently”. WDFW does not have sufficient data to either concur or not concur with this conclusion. Any potential increase in mortality is best evaluated in the context of additive mortality and cumulative impacts over the life of the high speed train project. There are likely to be some hotspots for wildlife mortality along the rail and these are likely to correspond to adjacent habitats, migration/travel corridors, and/or human caused funneling of habitat. The loss of lactating females and adult nesting birds often results in secondary mortality to dependent offspring. Impacts to nesting birds can often be avoided by timing construction to occur outside of nesting season for state priority species. Secondary mortality may not be readily apparent but should be factored into the overall estimate of increased mortality. Upon completion of the project, WDFW would encourage the proponent to monitor high speed train/wildlife collisions and create appropriate wildlife crossings structures to avoid collisions when and where hotspots for mortality are identified.

Fences, sound walls, railway buttresses, bulkheads and other vertical surfaces can impede migration/travel corridors for terrestrial wildlife and may result in fragmentation or isolation of certain wildlife species. Vertical surfaces may decrease terrestrial wildlife travel corridors to fewer locations which could concentrate crossings of nearby roads resulting in potential rail and road kill hotspots. WDFW encourages the proponent to avoid, minimize or otherwise mitigate habitat fragmentation, population isolation or the unintentional funneling of animals where it may be undesirable for wildlife or dangerous for humans. Correctly located and properly constructed wildlife crossing structures should be evaluated and installed where appropriate. In many cases, increasing the size of water crossing structures (such as bridges and culverts) can result in both improved fish passage and provide terrestrial wildlife underpasses. Indirect mortality caused by alterations to critical habitat (such as fragmentation caused by fencing without adequate wildlife crossings, incorrectly installed water crossing structures, and potential migration or dispersal barriers and isolation of some populations) may occur and should be evaluated for opportunities to avoid, minimize, mitigate or compensate for impacts as appropriate.

In addition to larger more visible wildlife species (such as deer and elk), the potential exists for the rails to become crossing barriers to smaller animals too such as amphibians, reptiles and small mammals. Tracks that provide a space between the ties are less likely to impede small terrestrial wildlife species if they can crawl under the tracks. A track with ballast material that is flush with the rail base between ties may result in a barrier to small wildlife. Stormwater drains and oil-separator devices may function like pitfall traps, however, they may be installed or retrofitted with animal exclusion or escape in mind. Smaller grate openings or screens can help exclude some animals. Sloped roughened vault walls may allow some animals a way to exit the vault. Without specific construction designs for the proposed rail it is not possible to provide more specific recommendations at this time.

WDFW encourages the project proponent to locate construction and staging areas outside of critical/sensitive habitats whenever possible and fully mitigate unavoidable impacts.

WDFW requests the opportunity to review and provide further comment on the project design as it is developed in order to both reduce adverse impacts and identify opportunities to benefit the public's resource.

Thank you for the opportunity to provide these comments. If you have any questions, please contact me at (360) 902-2598.

Sincerely,

A handwritten signature in cursive script that reads "Steven W. Bell". The signature is written in black ink and is positioned above the typed name.

Steven W. Bell, M.S.
WDFW MAPT Fish and Wildlife Biologist

SWB:swb: EA comment high speed rail

cc: SEPA Coordinator, WDFW
David Brock, WDFW R4HPM
Dave Howe, WDFW R5HPM
Stephan Kalinowski, WDFW R6HPM
MAPT, Bellevue

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October 22, 2009

Mr. Steven W. Bell, M.S.
MAPT Fish and Wildlife Biologist
Washington State Department of Fish and Wildlife
800 Capitol Way N
Olympia, WA 98501

**Subject: Response to the Washington State Department of Fish and Wildlife
comments on the Pacific Northwest Rail Corridor Program Environmental
Assessment**

Dear Mr. Bell:

Thank you for your letter of October 16, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

The purpose of this letter is to respond to the comments in your letter. In this letter, your quoted or paraphrased comments appear in italics, with responses in standard font.

Comment: "On page 7-3 of the EA document it references a WDFW Catalog of Washington Streams and Salmon Utilization (Volumes 1 and 2) from 1975. This information is outdated and greatly underestimates the number of fish bearing waters. We encourage WSDOT to use the most recent fish utilization information available such as the WDFW GIS database."

Although the WDFW Catalog of Washington Streams and Salmon Utilization from 1975 was used as a reference, it was not the only source of information used. Information on species and streams located within 1,000 feet of the rail corridor utilized the most current GIS data from WDFW, Ecology, WDNR, USFWS, NOAA Fisheries and WSDOT on stream crossings, resident and anadromous fish use, critical habitat designations and fish passage barriers. These information data sources are cited in other areas of the document. In addition, the environmental baseline for each county describes resident fish use as well as specifics on ESA-listed species for streams within the county. In Table 3 (pages 4-16, -17, -18) in the section on Biological Resources/Ecology, a list of all state and federally protected species within the corridor are provided. The narrative also provides a brief overview of resident species likely present in many or all of the streams described in the document. Due to the size and extent of the corridor, focus was given to protected species while still mentioning that resident species are likely to be present.

Mr. Steven W. Bell, M.S.
October 22, 2009
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Comment: "WDFW does not concur with the conclusion that there are no impacts from the "No Build Alternative" in the Biological Resources/Ecology portion of the EA (p.5-7). Maintaining an existing fish blockage is maintaining an adverse impact."

WSDOT acknowledges that existing fish passage barriers in and around the corridor may harm fish into the future. However, these conditions were not created by the "No-Build Alternative," therefore, they would not generally be considered impacts. Considering the results of inaction as impacts supports the case for the corridor expansion alternative. In locations where improvements would be made as part of the expansion, existing impediments to fish passage may be removed as part of the project. These potential benefits will be analyzed in detail as each improvement project is undertaken.

Comment: "WSDOT requests the proponent inventory their water crossing structures and replace them with stream simulation culverts or bridges as appropriate per RCW 77.57.030."

WSDOT will consider the request to inventory all crossings; however, these crossings fall within the external jurisdiction of BNSF Railway.

Comment: "WDFW is concerned that a high speed train is likely to result in increased mortality to wildlife species as the opportunity for more frequent train/wildlife collisions would be expected to occur as a result of the operational impacts upon completion of the project. The EA (p.5-8) states that the current rate of train/wildlife collision 'occurs infrequently'."

With the exception of the Point Defiance Bypass in suburban Pierce County, the passenger train speeds resulting from the proposed improvements will only be a small increase in speed over the current speed at any one location. The corridor currently hosts more than 60 trains per day in some rural segments, therefore the addition of eight trains per day is a relatively small increase in train frequency. Additionally, on average a train passes any given location on the corridor approximately once an hour. This frequency is far less than the vehicle frequency on I-5, which is in close proximity to the rail corridor over most of the route. Finally, nearly all the specific improvements in the corridor expansion are proposed to improve an existing corridor, so wildlife in the vicinity are already accustomed to the passing of trains.

Comment: WDFW raised a number of concerns about wildlife barriers as a result of railroad infrastructure.

Most of the improvements considered in the corridor expansion alternative are in urban or suburban areas, lessening the likelihood of encountering wildlife corridors. However,

Mr. Steven W. Bell, M.S.
October 22, 2009
Page 3

WSDOT will engage WDFW early for projects that may require mitigation, minimization or compensatory actions. We will also consider options to limit wildlife interactions during project design.

Comment: "WSDOT encourages the project proponent to locate construction and staging areas outside of critical/sensitive habitats whenever possible and fully mitigate unavoidable impacts."

WSDOT will continue to make efforts to remain outside of critical/sensitive habitats whenever possible as the individual improvements are designed, and will work with WDFW to mitigate unavoidable impacts.

Thank you again for your detailed comments. We look forward to working with your agency if funding is provided for the proposed projects.

Should you have any questions, please don't hesitate to contact me at 360-705-7902 or at phinnee@wsdot.wa.gov.

Sincerely,



Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

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October 22, 2009

Elizabeth Phinney
Rail and Marine Office
Washington State Department of Transportation (WSDOT)
P.O. 47407
Olympia, WA 98504-7407

Dear Ms. Phinney:

This letter transmits the City of Auburn's comments regarding the programmatic Environmental Assessment (EA) for the **Pacific Northwest Rail Corridor, Washington State Segment - Columbia River to the Canadian Border** project. On behalf of the City, I would like to thank WSDOT staff for taking the time to meet with City staff to explain the proposal in more detail and answer our questions. Based on the additional information you have provided, we feel we have a better understanding of the scope of the EA and wish to retract our prior letter dated October 19, 2009, and replace it with this letter.

Many of our initial questions regarding the PNWRC expansion concerned how plans for expanded service would address potential alternative station stops as the proposed project moves forward. Based on our discussion with WSDOT staff, we understand that WSDOT intends to collaborate with the City of Auburn, the Puget Sound Regional Council, Amtrak and host railroads, Sound Transit, and others to explore alternative station stops, including one in particular at Auburn, as plans for expanded service are developed.

The City of Auburn supports the efforts of the Federal Railroad Administration (FRA) and WSDOT to expand intercity passenger rail service in Washington state, and we look forward to working with you in the project level development and implementation phases of this proposal. We have reviewed the EA and have the following comments:

Comments

1. **Project environmental documents should address how plans for expanded PNWRC service will be developed and evaluated.**

While we understand that at this time, the purpose of the EA is to conduct an environmental evaluation of PNWRC service improvements on the existing facility at a programmatic level, the City of Auburn believes that project environmental documents should discuss how the development and evaluation of service options would occur in the future as the project moves forward. Specifically, we feel that future project-level environmental analyses should consider establishing a station stop at the existing Auburn urban rail station on the intercity line. Auburn is a prime intermodal hub of major highways (SR167 & SR18), three transit

systems (Metro Transit*, Sound Transit*, Pierce Transit*); rail (Sounder*, Amtrak, Burlington Northern Santa Fe, and Union Pacific), airport (Auburn Municipal Airport), regional pedestrian and bicycle facilities (Interurban Trail), and other urban amenities. The Auburn urban rail station is:

- Equidistant from Tacoma and Seattle and located approximately 3 miles from Interstate 5 (with direct access via SR 18);
- Home to an existing state of the art transit station with rail platform and parking for 600 vehicles;
- Currently a daily transfer point for over 2,300 bus passengers and 450 Sounder rail commuters, and the 2nd most heavily used rail station in the Sounder system; and
- Centrally located, within 10-miles of approximately 500,000 people, including residents of the cities of Auburn, Federal Way, Algona, Pacific, Kent, Maple Valley, Covington, Fife, Edgewood, Puyallup, Sumner, and Black Diamond, as well as residents of the unincorporated areas of South King and North Pierce Counties.

In addition, the potential Diesel Multiple Unit (DMU) service currently being studied by WSDOT would directly connect the Southeast King County cities of Covington, Maple Valley, and Black Diamond with the proposed intercity rail service in Auburn.

2. Future project-level environmental review needs to consider the following environmental elements as they relate to the development and evaluation of plans for expanded service: Land use, Transportation, Air Quality, and Use of Energy Resources.

A. Land Use. The Puget Sound Regional Council (PSRC) is the federally-designated Metropolitan Planning Organization (MPO) and state-designated Regional Transportation Planning Organization (RTPO) for the four county (King, Pierce, Kitsap, and Snohomish Counties) Central Puget Sound Region, which has a total current population of over 3.5 million people. *Vision 2040* is the regional land use plan to address the Central Puget Sound's projected 1.7 million additional people and 1.2 million new jobs over the next 30 years. *Vision 2040* recognizes Auburn as a Regional Growth Center and as one of 14 Core Cities as part of the Regional Growth Strategy for the Central Puget Sound. Designated Core Cities contain key hubs for the region's long-range multimodal transportation system, and are major civic, cultural, and employment centers within their counties. The *Regional Growth Strategy* envisions a major role for Core Cities such as Auburn in accommodating growth, calling for them to accommodate 21 percent of the region's population growth and 28 percent of the employment growth over the next 30 years. Future project-level analyses should address the development and evaluation of PNWRC service plans, and how such plans would be coordinated with planned centers of regional growth such as Auburn.

B. Transportation. Future project-level evaluation of the proposal's transportation benefits and impacts should include all transportation modes, including bicycle and pedestrian, and impacts on traffic congestion. This analysis should include evaluating various service

* Metro Transit, Sound Transit, Pierce Transit, and Sounder commuter rail all currently use the existing Auburn urban rail station on the BNSF line.

options, including an intercity rail stop at the existing intermodal Auburn urban rail station on the BNSF line.

- C. **Air Quality.** Future project-level consideration of air quality impacts should include an analysis of travel modes and trip distribution associated with passenger access to and from the intercity rail stations, including an evaluation of the proposed location of those stations in relationship to projected centers of future population and employment growth.
- D. **Use of Energy Resources.** Future project-level evaluation of energy use and opportunities to reduce energy consumption should include consideration of the energy consumption (or savings) associated with passenger access to and from the intercity rail stations, and including an evaluation of the proposed location of those stations in relationship to projected centers of future population and employment growth. This analysis should include evaluating various service options, including an intercity rail stop at the existing intermodal Auburn urban rail station on the BNSF line.

3. The specific information sources used to support specific statements or conclusions in the EA was not always clear.

While there are a number of studies and reports listed in the EA in *Section 7 - References*, it was in some cases difficult to determine which sources were used for specific statements of existing conditions or analysis conclusions. In addition, we found that a number of the listed reference documents were somewhat outdated. We understand that older information was used as a starting point for developing the EA, but that newer information was also included where appropriate. We suggest that the document's clarity regarding which information sources were used for specific statements and conclusions could be improved by providing additional citations in the body of the document to the sources listed in Section 7, as appropriate.

Thank you for the opportunity to review and comment on this proposal. The City of Auburn looks forward to working with FRA and WSDOT to develop an intercity passenger rail system that provides residents of Auburn and the surrounding Central Puget Sound region with increased transportation choices, efficiencies, and environmental benefits.

Sincerely,



Cindy Baker, AICP
Director, Planning, Building & Community Department

Cc: City of Auburn
Pete Lewis, Mayor
Dennis Dowdy, Director, Public Works Department
Chris Andersen, Interim Environmental Manager

Elizabeth Phinney
October 22, 2009
Page 4 of 4

Dennis Selle, City Engineer/Transportation Division Manager
Joe Welsh, Transportation Planner

Washington State Department of Transportation
Scott Witt, Director, State Rail and Marine Office
Andrew Wood, Deputy Director, State Rail and Marine Office
Megan White, Director, Environmental Services
Carol Lee Roalkvam, Manager, Environmental Policy Branch
Jeff Schultz, Project Manager



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October 22, 2009

Ms. Cindy Baker, AICP, Director
Planning, Building & Community Department
25 West Main Street
Auburn, WA 98001-4998

**Subject: Response to the City of Auburn comments on the Pacific Northwest
Rail Corridor Program Environmental Assessment**

Dear Ms. Baker:

Thank you for your letter of October 22, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA). We appreciate your support of expanded intercity passenger rail service in Washington state.

As noted in your letter, future project-level documentation should address how plans for expanded intercity passenger rail service will be developed and evaluated, in particular, whether an Amtrak station stop could be established at the existing Auburn commuter rail station. A paragraph describing how future train stops will be evaluated using a business case analysis has been incorporated by reference into the EA, as shown in the errata section of the FONSI.

WSDOT acknowledges that specific information sources used in the EA were not always clear; using the errata section in the FONSI, those references have now been updated.

WSDOT looks forward to working with the City of Auburn in the future as intercity passenger rail service expands.

Sincerely,

Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

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Megan White
Director, Environmental Services Office
WSDOT
P.O. 47407
Olympia, WA 98504-7407

Dear Ms. White;

On October 8, 2009 we received a NEPA Programmatic Environmental Assessment (EA) prepared and issued by your agency for the Pacific Northwest Rail Corridor, an Intercity Passenger Rail Program from Vancouver, BC. to Portland. As indicated in the EA, this Rail Program affects nearly 200 jurisdictions and agencies in the Northwest (NW) and has the magnitude of other regional transportation programs such as Sound Transit and I-405 Corridor Improvements Program. In response to the EA our city along with cities of Black Diamond, Covington, and Maple Valley expressed several concerns that have subsequently changed. Therefore, the cities wish to retract and substitute this letter for the previous October 16, 2009 letter.

The reasons for these changes come from very productive meetings with Deputy Director Andrew Wood of WSDOT Rail & Marine, you, and others from WSDOT. We now better understand the “high speed” focus of the EA and appreciate the collaborative efforts between WSDOT and City of Auburn to derive the following language that will be included in an addendum to the EA:

“In response to comments received on the Environmental Assessment, WSDOT wants to clarify how different station stops will be considered in the future. This EA is in support of 25 Track 2 specific projects, none of which address alternate station stops. WSDOT commits to exploring alternative station stops, including one in particular at Auburn, as plans for expanded service are developed. (This will be done through collaboration with PSRC, Amtrak and the host railroad, Sound Transit, and City of Auburn and in consideration of the State-studied Diesel Multiple Unit service.) A similar approach would be used when examining station stops elsewhere. Locations will be evaluated in the future using a business case analysis.”

This language goes a long way to addressing the cities’ needs. We continue to believe that the rail program will “...accommodate future intercity travel, ensure state economic vitality, save energy, and protect the state’s quality of life demand” and trust that WSDOT will seriously consider distributing stops differently, especially to include a rail stop at Auburn for the following reasons:

- Without adequate access to intercity rail service, the communities in South King County will be adversely impacted and inadequately served

- The State-studied Diesel Multiple Unit (DMU) service would directly connect to the proposed intercity rail service in Auburn thus serving South King County, one of the fastest growing areas in the state with over 500,000 people within 10 miles.
- Auburn was an intercity passenger stop for over 80 years and should be a main stop again because Auburn is
 - a prime intermodal hub of major highways (SR167 & SR18), transit, rail, (Sounder, Amtrak, and BNSF), airport, bicycle facilities and urban amenities
 - equidistant from Tacoma and Seattle, along the intercity line
 - home to an existing state of the art transit station with 600 parking spaces
 - currently a daily transfer point for 2300 bus passengers & 450 Sounder commuters and the 2nd busiest station on Sounder
 - a future east-west rail route from Spokane
 - located where the station has direct access to major SR18
 - a location that promotes energy efficiencies and reduced pollution

Auburn remembers the agreement made many years ago about the rail service stop at Boeing instead of in the city. However, times have changed and even if the information that determined this agreement had been realistic at the time, significant long-term changes to businesses, including the fact that Boeing is no longer at that location, and fundamental changes in the national economy since that time have made the schedules and number of trains and location of new stops important to re-evaluate

We sincerely appreciate the efforts made and look forward to future discussions about a rail stop in Auburn.



Pete Lewis, Mayor
City of Auburn



David Johnston, City Manager
City of Maple Valley



Derek Matheson, City Manager
City of Covington



Leonard Smith, City Administrator
City of Black Diamond

S Elizabeth Phinney

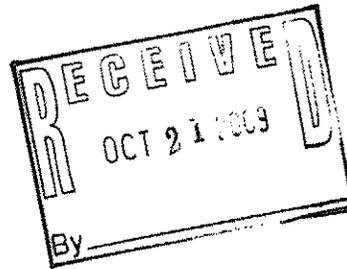


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CLARK COUNTY
WASHINGTON

BOARD OF CLARK COUNTY COMMISSIONERS

Tom Mielke • Marc Boldt • Steve Stuart



October 13, 2009

WSDOT State Rail and Marine Office
Attn: Elizabeth Phinney
PO Box 47407
Olympia, WA 98504

RE: Comments on WSDOT EA for Pacific Northwest Rail Corridor

Dear Ms. Phinney:

Clark County is generally supportive of efforts to increase existing transportation systems, such as the rail system. Because the rail system currently runs through Clark County, we are pleased to be given the opportunity to provide comment under NEPA. However, we must ask that you extend the comment period. We were given the notice of the project and opportunity to comment on October 13 with a comment deadline of October 19. This is not sufficient time to make meaningful comments and does not comply with legal requirements for comment periods.

The Build Alternatives described in the EA will require review by Clark County Community Development, and several types of permits will be required. In some cases, Clark County's code matches similar state and federal codes, but there are ordinances in which Clark County's codes are different than state/federal requirements. We request that WSDOT work early and often with Clark County to ensure that all necessary reviews are completed in a timely manner. Some types of reviews will require specific public hearings to occur.

We request to be involved with all aspects of this project that will occur within Clark County's borders. Your point of contact to coordinate/correspond with Clark County in this matter shall be Karen Streeter. Karen can be reached at (360) 397-6118 or Karen.Streeter@clark.wa.gov.

Again, thank you for the opportunity to provide comment.

Sincerely,

Marc Boldt, Chair

Steve Stuart, Commissioner

Tom Mielke, Commissioner

c: Marty Snell, Director of Community Development
Bronson Potter, Deputy Prosecuting Attorney
Karen Streeter, Department of Public Works

1300 Franklin Street • P.O. Box 5000 • Vancouver, WA 98666-5000 • tel: [360] 397-2232 • fax: [360] 397-6058 • www.clark.wa.gov



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Washington State
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October 22, 2009

Board of Clark County Commissioners
Clark County
PO Box 5000
Vancouver, WA 98666-5000

**Subject: Response to Clark County comments on the Pacific Northwest Rail
Corridor Program Environmental Assessment**

Dear Commissioners:

Thank you for your letter of October 13, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

The purpose of this letter is to respond to the comments in your letter.

We understand Clark County's desire to have the comment period extended. WSDOT agrees that the comment period was very short. The Track 2 application deadline for High Speed Intercity Passenger Rail funding was October 2, 2009, which also required a NEPA program-level environmental document to be submitted at the same time. Comments on the Program EA (along with WSDOT responses) have to be submitted to FRA by Friday, October 23. WSDOT is open at any time to receiving any additional comments that the County would like to make on the Program EA.

WSDOT will continue to remain responsive to any concerns that Clark County has regarding the rail projects, and will include Ms. Karen Streeter in all our future project coordination with the County. Also, Ms. Streeter should feel free to contact our office at any time. Kevin Jeffers, the rail engineer for the Clark County rail projects, can be contacted at 360-705-7982 or at jefferk@wsdot.wa.gov. I can be contacted at 360-705-7902 or at phinnee@wsdot.wa.gov.

Sincerely,

Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

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DEPARTMENT OF BUILDING AND PLANNING

207 Fourth Avenue North
Kelso, WA 98626
TEL (360) 577-3052
FAX (360) 414-5550

www.co.cowlitz.wa.us/buildplan

Board of County Commissioners

Kathleen A. Johnson	District 1
George Raiter	District 2
Axel Swanson	District 3

October 21, 2008

Sent Via Email

WSDOT
State Rail and Marine Office
PO Box 47407
Olympia, WA 98504-7407
phinnee@wsdot.wa.gov

RE: Pacific Northwest Rail Corridor Program Env. Assessment

Dear Ms. Phinney:

Thank you for the opportunity to review and comment on the Program EA for the referenced project. As it appears, this project will be crossing through, or within buffer width, of many environmentally sensitive areas in our County; impacts to these critical areas, floodplains and shorelines will require in-depth reviews, potential mitigation and permitting.

Once the additional review is underway for Cowlitz County, please don't hesitate to call me regarding the County's regulatory and permitting requirements; contact me at (360) 577-3052 or by email at hendriksenl@co.cowlitz.wa.us.

Sincerely,

Lisa A. Hendriksen
Planning Manager
Cowlitz County

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October 22, 2009

Ms. Lisa A. Hendriksen
Planning Manager
Cowlitz County
207 Fourth Avenue North
Kelso, WA 98626

**Subject: Response to Cowlitz County comments on the Pacific Northwest Rail
Corridor Program Environmental Assessment**

Dear Ms. Hendriksen:

Thank you for your letter of October 21, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

The Program EA listed four proposed projects that are located in Cowlitz County. As you requested, when project-level documentation is prepared for the proposed projects, we will be contacting the County for regulatory and permitting requirements.

Please don't hesitate to contact me if you have any questions. I can be reached at 360-705-7902 or at phinnee@wsdot.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Phinney".

Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

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Douglas G. Richardson
Mayor

Don Anderson
Deputy Mayor

Claudia B. Thomas
Council Member

Pad Finnigan
Council Member

Helen McGovern
Council Member

Walter Neary
Council Member

Ron Cronk
Council Member

Andrew E. Neiditz
City Manager

Heidi Ann Wachter
City Attorney

Alice M. Bush, MMC
General Services Director
City Clerk

October 19, 2009

Ms. Elizabeth Phinney
Rail Environmental Manager
WSDOT Rail Office
P.O. Box 47407
Olympia, WA 98504-7407

Subject: **Pacific Northwest Rail Corridor Program Environmental Assessment**

Dear Ms. Phinney:

Thank you for the opportunity to provide comments on the NEPA Program Environmental Assessment for the Pacific Northwest Rail Corridor. I understand that this document was produced in just a few short months and considering the vast scope of the report (297 miles through nine counties), we appreciate that you forwarded this to the many stakeholders for review.

As we understand it, the purpose of the Program Environmental Assessment is to determine if the environmental impacts of implementing a corridor-wide rail service expansion plan are significant, and if so, to mitigate environmentally unsound concepts before they are turned into projects.

The City believes that each of the three Service Block proposed in the Program EA have the potential to induce significant adverse impacts on the Lakewood section of the PNWRC, including the seven at-grade crossings at Berkeley Avenue, Thorne Lane, Clover Creek Drive, Bridgeport Way, 108th Street, 100th Street and Steilacoom Boulevard. The Point Defiance Bypass project, studied by WSDOT in 2008, includes new track, new right-of-way acquisition and a substantial increase to the number and speed of trains going through our community. The three Service Block proposed projects could add up to four additional round trips, and the potential for five more round trips in future phases. In the future, our rarely used rail corridor could have up to 26 daily crossings in all which could have a profoundly adverse impact on our residents and citizens.

We have identified four specific additional concerns:

1. *Chapter Four - Existing Conditions and Chapter Five - Impacts and Mitigation*

- a. Neither of these chapters included any review of Transportation impacts. While the PNWRC is generally rural in the southern and northern sections of the corridor, the central section goes through the most densely populated and urban areas of Washington State. This omission could be considered a fatal flaw of the entire report.
 - i. The City raised significant safety and traffic congestion concerns that would be present at the at-grade crossings during the Pt. Defiance Bypass Documented Categorical Exclusion (DCE) process in 2008. These issues should be acknowledged in the PNWRC Program EA.
 - ii. The City remains concerned with the safety hazards at the Berkeley Street crossing due to the proximity to the Interstate 5 ramp signals. WSDOT has still not made clear how this intersection will be cleared of traffic prior to the high-speed trains crossing. The addition of four new daily round trips makes this issue even more critical to resolve.
2. *Social and Economic*
- a. Many of the areas that these trains travel through have been identified as severely disadvantaged with high rates of poverty and unemployment. Access to the Tillicum neighborhood area is especially difficult, as the train tracks cut it off from the rest of the Lakewood. Without adequate mitigation, the proposed increase to the number of high speed trains will exacerbate existing traffic patterns and cause a disproportionate environmental burden on these residents.
3. *Land Use*
- a. The City of Lakewood Comprehensive Plan was adopted in 2000, not 2004 as reported on page 4-41, and has been amended annually.
4. *Noise*
- a. The report states that "general noise and vibration analyses were conducted and it was discovered that noise and vibration levels are already high through the program corridor due to existing freight operations." While this might be true for some sections of the PNWRC, it is not at all accurate for that portion of the portion through Lakewood, known as the Pt. Defiance Bypass rail alignment
 - i. Currently Tacoma Rail runs a freight train through Lakewood on Thursdays and Sundays (once during the work week). This is significant in that the baseline for the noise model (at Page 4-65) claims that freight trains run 24 hours a day and that the average freight train consists of 100 cars and four diesel locomotives.
 - ii. The FRA and FTA noise impact criteria are based on "the percentage of people expected to be highly annoyed by the addition of any given amount of noise to their current environment". Therefore, to assume that people are used to 100

car freight trains, 24 hours per day when they are actually only used to a single, less than daily train traveling at a less than 10 mph will greatly distort the results and will likely result in significant adverse noise impacts.

The City of Lakewood is supportive of reliable and efficient intercity passenger rail service and agree that it is important to provide travel options in order to relieve the congested Interstate system. However, we maintain that high speed rail can be integrated into the existing communities along the PNWRC without adversely impacting the safety or well-being of those residents.

It is our goal to see a much more robust environmental review, (one that includes a review of existing conditions for transportation and any potential mitigation to alleviate those impacts), in the very near future.

Sincerely,

A handwritten signature in black ink, appearing to read "David Bugher". The signature is fluid and cursive, with a large loop at the end.

David Bugher
Assistant City Manager

Cc: Andrew Neiditz, City Manager
Heidi Wachter, City Attorney

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October 22, 2009

Mr. David Bugher
Assistant City Manager
City of Lakewood
6000 Main Street SW
Lakewood, WA 98499-5027

Subject: Response to the City of Lakewood comments on the Pacific Northwest Rail Corridor Program Environmental Assessment

Dear Mr. Bugher:

Thank you for your letter of October 19, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

The purpose of this letter is to respond to the comments in your letter. In this letter, your quoted or paraphrased comments appear in italics, with responses in standard font.

Third Paragraph "... .. The three Service Block(s) proposed could add up to four additional round trips and the potential for five more round trips in future phases. In the future, our rarely used rail corridor could have up to 26 daily crossings in all which could have a profoundly adverse impacts on our residents and citizens."

The reference to five additional round trips and to up to 26 daily crossings in the future implies that the program EA proposes and analyzes up to 13 Amtrak *Cascades* round trips between Seattle and Portland. However, the Program EA only analyses up to 8 such round trips. Further, the rail traffic levels analyzed in the Program EA is very similar to those analyzed in the project-level NEPA Documented Categorical Exclusion (DCE) for the Point Defiance Bypass project. Thus, the underlined phrase "potential to induce significant adverse impacts" earlier in the paragraph is not supported.

Comment 1: The omission of a review of Transportation impacts could be considered a fatal flaw of the entire report.

Detailed transportation impacts of a project are evaluated when project-level analysis is prepared, such as was done for the Point Defiance Bypass Rail Project. Regional transportation issues are evaluated by the Puget Sound Regional Council (PSRC) in their

Mr. David Bugher
October 22, 2009
Page 2

regional transportation plan. In fact, the Point Defiance Bypass Project was included in PSRC's 2007 Update to the Metropolitan Transportation Plan for the Central Puget Sound Region (Destination 2030).

Comment 1a.i: The safety and roadway congestion concerns raised by the City of Lakewood as part of the Point Defiance Bypass DCE should be acknowledged in the Program EA.

Such safety and congestion concerns are addressed generally in the Program EA, but the project-specific reference to the City of Lakewood concerns was not included as they were addressed in the project-level NEPA DCE.

Comment 1.a.ii: "The City remains concerned with the safety hazards at the Berkeley Street crossing due to the proximity to the I-5 ramp signals. WSDOT has still not made clear how this intersection will be cleared of traffic prior to the High-Speed trains crossing."

WSDOT has had numerous meetings with, and has given demonstrations of visualizations of the modeling results, to the city transportation and planning staff to address clearing the crossings and queuing at all adjacent intersections. The design at Berkeley Street will limit when vehicles have access to the crossing. This will be at times when they can continue beyond the crossing without stopping at the I-5 southbound on/off ramp intersection signal. This limits their opportunity to be blocking the crossing. A similar situation is created in the westbound direction.

Further, the phrase "High-Speed trains" is not accurate for any service discussed in the Program EA. The Program EA does not propose to raise speeds above the current maximum of 79 mph, while FRA classifies a high-speed train as one that is travelling in excess of 90 mph.

Comment 2: "Many of the areas that these trains travel through have been identified as severely disadvantaged with high rates of poverty and unemployment. Access to the Tillicum neighborhood area is especially difficult, as the train tracks cut it off from the rest of Lakewood. Without adequate mitigation, the proposed increase to the number of high speed trains will exacerbate existing traffic patterns and cause a disproportionate environmental burden on these residents."

The Environmental Justice analysis completed for the Point Defiance Bypass Project showed that the Tillicum neighborhood, although disadvantaged, did not receive a disproportionate high and adverse impact from intercity passenger rail service.

Mr. David Bugher
October 22, 2009
Page 3

Comment 3: "The City of Lakewood Comprehensive Plan was adopted in 2000, not 2004 as reported on page 4-41, and has been amended annually."

A correction will be made to the date for the City of Lakewood Comprehensive Plan.

Comment 4: The general statement that existing noise levels from existing freight operations on the rail corridor is not applicable to the Point Defiance Bypass route due to the relatively small amount of freight rail traffic on the line.

It is true that the amount of rail traffic on the route is small. The Program EA addresses impacts in a generalized manner but project-specific analysis is still required as project specifics become known. As the city staff is aware, a noise impact analysis was prepared as part of the project-level NEPA DCE for the Point Defiance Bypass project. With wayside horns to be installed at the seven at-grade crossings in Lakewood and other at-grade crossings outside of Lakewood, the analysis found no significant impacts from noise.

We sincerely appreciate the cooperation and aid your staff has provided in these matters. Please be assured that WSDOT will continue to work with the City of Lakewood to increase safety for all its citizens as this project moves forward. We look forward to making a presentation at the Lakewood City Council work session on November 9th.

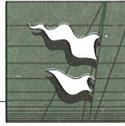
Sincerely,



Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

cc: Kevin Jeffers, WSDOT

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PORT OF BELLINGHAM
Washington State

October 19, 2009

Ms. Elizabeth Phinney

Via: email : phinnee@wsdot.wa.gov

RE: Pacific Northwest Rail Corridor – Washington State Segment
Response to Program Environmental Assessment, September 2009

Dear Ms. Phinney:

The Port of Bellingham supports the Program Environmental Assessment as submitted in the referenced document.

We understand that any future projects that may develop from this program would produce separate environmental assessments and avoidance / mitigation proposals as project designs become more fully developed.

Generally, the Port of Bellingham recognizes the importance of multimodal uses of transportation facilities to increase mobility, safety, and sustainability. The Pacific Northwest Rail Corridor Program is a key element of these goals.

In order to produce the most meaningful advancement of these goals it is our opinion that the Service Block 3 Proposed Projects should be pursued as the funding goal.

The projects listed in this Service Block will produce the most significant improvements in transportation modal choices for various user groups and provide needed improvements to the transportation infrastructure of the State of Washington and the Pacific Northwest Region. These improvements will provide economic benefits and the potential for further economic growth and vitality.

Sincerely,

Fred J. Seeger
Interim Executive Director

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October 22, 2009

Mr. Fred Seeger
Interim Executive Director
Port of Bellingham
PO Box 1677
Bellingham, WA 98227-1677

**Subject: Response to the Port of Bellingham comments on the Pacific Northwest
Rail Corridor Program Environmental Assessment**

Dear Mr. Seeger:

Thank you for your letter of October 19, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

WSDOT is very appreciative of the Port's support for the proposed projects listed in Service Block 3 of the Corridor Service Expansion Alternative, and we look forward to working with you in the future.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Phinney".

Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

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From: Mannelly, Brian [mailto:bmannelly@portoftacoma.com]

Sent: Monday, October 19, 2009 3:15 PM

To: Phinney, Elizabeth

Cc: Reilly, Michael; St. Clair, Larry; Harner, Wayne; Mauermann, Sue

Subject: Pacific Northwest Rail Corridor Program Environmental Assessment: Port of Tacoma Comments

Elizabeth,

The Port of Tacoma supports the Pacific Northwest Rail Corridor and WSDOT's advocacy for more effective intercity passenger rail service and a more efficient comprehensive rail network serving Washington State. In reviewing the Program Environmental Assessment, we would like to offer the following comments for your consideration:

Land Use Section

- How will the Corridor Service Expansion Alternative impact/benefit businesses currently served by the TMBL or other short line providers along the corridor?
- Does the build solution create any ripple effect that impacts freight rail service at a regional level? If so, how will this be mitigated?

Social and Economic Section

- Please provide specific discussion around operational impacts/benefits to freight rail along the mainline (and short line rail providers); as well as impacts or benefits to the industrial land uses in which these operations primarily serve.
- As passenger and freight rail utilize shared corridor resources, how are arterial roadway connections impacted (furthering economic and air quality impacts as cars and trucks potentially idle behind at-grade rail crossings throughout the region?)

Thank you for the opportunity to comment on the document,
Brian

Brian Mannelly AICP, LEED AP | Port of Tacoma | Director, Planning | PO Box 1837, Tacoma, WA 98401-1837 | (253) 428-8671

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October 22, 2009

Mr. Brian Mannelly, Director
Planning
Port of Tacoma
Po Box 1827
Tacoma, WA 98401-1837

**Subject: Response to the Port of Tacoma comments on the Pacific Northwest
Rail Corridor Program Environmental Assessment**

Dear Mr. Mannelly:

Thank you for your e-mail of October 19, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA). We appreciate the Port of Tacoma's support of the intercity passenger rail program.

The purpose of this letter is to respond to the comments in your e-mail. In this letter, your quoted comments appear in italics, with responses in standard font.

Comment: "How will the Corridor Service Expansion Alternative impact/benefit businesses currently served by the TMBL or other short line providers along the corridor?"

Of the six shortlines that interchange with BNSF or Union Pacific on the Pacific Northwest Rail Corridor, Tacoma Rail's operations between East Olympia and South Tacoma are the most affected, both positively and negatively. While the passenger operations over the Sound Transit-owned Lakeview Subdivision and Spur will likely restrict how the switching operations can be accomplished, the operations costs will be lower as they will be able to move along the line faster. This will not change how land is developed or re-developed for freight rail related industries.

Comment: "Does the build solution create any ripple effect that impacts freight rail service at a regional level? If so, how will this be mitigated?"

All the freight operations that exist on the line will be kept whole. There will be some secondary benefit to freight operations in locations such as Kalama, Longview, Vancouver, Everett, and Blaine where the projects are intended to improve freight operations to clear the main line for increased passenger train reliability and frequencies.

Mr. Brian Mannelly
October 22, 2009
Page 2

Comment: "Please provide specific discussion around operational impacts/benefits to freight rail along the mainline (and short line rail providers); as well as impacts or benefits to the industrial land uses in which these operations primarily serve.

All the freight operations that exist on the line will be kept whole. As stated previously, there will be some secondary benefit to freight operations in locations such as Kalama, Longview, Vancouver, Everett, and Blaine where the projects are intended to improve freight operations to clear the main line. Specific benefits will vary by location and design details. Generally the benefits will be more efficient switching from the lengthening of sidings or switching leads and from the addition or lengthening of yard tracks to create receiving and departure tracks long enough to accommodate 7,000-foot trains or longer. This could increase the frequency of freight rail service or make more rail cars available for rail customers, thus increasing the development of land already zoned for industrial use.

Comment: "As passenger and freight rail utilize shared corridor resources, how are arterial roadway connections impacted (furthering economic and air quality impacts as cars and trucks potentially idle behind at-grade rail crossings throughout the region?"

At five project locations along the corridor, the improvements proposed include grade separations, which reduce delays to roadway vehicles. There could be a small increase in traffic delays occurring at the remaining at-grade crossings as a result of the additional passenger trains. However, an Amtrak *Cascades* train is relatively short compared to a typical freight train, keeping the waiting time at a grade crossing as short as 45 seconds.

Should you have additional technical questions, please contact Kevin Jeffers at 360-702-7982 or at jefferk@wsdot.wa.gov. For environmental questions, please contact me at 360-705-7902 or at phinnee@wsdot.wa.gov.

Sincerely,



Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

Elizabeth Phinney
WSDOT State Rail & Marine Office
P.O. Box 47407
Olympia, WA 98504-7407

Thank you for the opportunity to review the Environmental Assessment. Although the official comment deadline has passed, I hope that the Washington State Department of Transportation will consider the following comments:

1. The rail corridor parallels the Puget Sound shoreline through most of Snohomish County and, as such, has the potential to impact aquatic habitat along its length. We would encourage DOT to consider adding to its program a plan for targeted habitat improvements to its plans—not just mitigation for new impacts, but projects and actions that could reduce impacts that have occurred over the years.
2. In areas where the rail corridor separates bluff areas from the Sound, in particular, the Meadowdale Park area of south Snohomish County, sediment transport from the bluffs to the Puget Sound has been restricted to culverts only, reducing critical material transport into the Sound. We would encourage and support an analysis or project to increase the sediment transport from one side of the tracks to the other.
3. Your report (Page 5-16) mentions the need for wetland mitigation in Snohomish County, with a possible purchase of adjacent farmland to convert into wetland as compensation. Snohomish County has a strong legacy of supporting continued agricultural uses of Agricultural-zoned land, and, while recognizing that the rail lines run in the floodplains adjacent to these Ag properties, we would encourage DOT to look at other options for wetland mitigation. We also encourage you to work closely with the Ag community in any plans to convert Ag land to wetland mitigation in Snohomish County. It may be possible to work together on a wetland banking scenario or other option that may be of benefit to this project while preserving valuable farmland.
4. Your report (Page 5-8) also mentions impacts to fish habitat. The County (Public Works Surface Water Management) has a strong habitat enhancement program and would be happy to discuss coordination of potential habitat enhancements with you.
5. Your report (Page 5-2) mentions fill in the floodplain of the Snohomish River, with the statement “As the fill areas are in the large floodplains of the....Snohomish River, the added fill areas are not anticipated to make a noticeable impact to the capacity of this floodplain.” You may be aware that the County recently enacted Critical Areas Regulations that include more stringent requirements for construction in floodplains, including compensation for loss of floodplain storage. We recommend that you consider using raised rail beds (trestles, etc.) or other methods to limit or eliminate any floodplain fill in this area.
6. It appears that these improvements may provide many opportunities for coordination of habitat and Agriculture-related impacts and improvements with Snohomish County, and we welcome the opportunity to discuss these with you as your plans move forward.

Karen R. Kerwin, P.E.,
Drainage Supervisor
Snohomish County Surface Water Management

Candice Soine, Environmental Review Coordinator

Snohomish County Public Works
TES - Environmental Services
3000 Rockefeller, 5th Floor Admin West
Everett, WA 98201

(425) 388-3488 extension 4259
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October 23, 2009

Ms. Karen R. Kerwin, P.E.
Drainage Supervisor
Surface Water Management
Snohomish County Public Works
3000 Rockefeller, 5th Floor Admin West
Everett, WA 98201

**Subject: Response to Snohomish County comments on the Pacific Northwest
Rail Corridor Program Environmental Assessment**

Dear Ms. Kerwin:

Thank you for your e-mail of October 23, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

We appreciate your detailed comments on what will be expected for the analysis and mitigation for future rail projects that will be constructed in Snohomish County. We will coordinate closely with County staff during the preparation of the project-level documentation.

We look forward to working with Snohomish County in the future.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Phinney".

Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

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October 15, 2009

WDOT State Rail and Marine Office
PO Box 47407
Olympia, WA 98504-7407
Via facsimile

RE: Comments regarding Pacific Northwest Rail Corridor Program Environmental Assessment

Thank you for the opportunity to comment on the above referenced document.

The City of Sumner supports efficient multi-modal transportation alternatives and understands that improved passenger rail service along the northwest rail corridor is a key component of accomplishing legitimate regional transportation goals. We believe that improvements such as those discussed in the Pacific Northwest Rail Corridor Program Environmental Assessment can be accomplished in ways that enhance quality of life in the region while preserving those same values in individual communities along the corridor.

The City has the following comments:

1. The Assessment notes in general terms that the Corridor Service Expansion Alternative provides for an increase of service level for Amtrak trains to eight round trips per day. The City does not see an indication of the approximate schedule that these trips would occur on. Please provide as much information as practical describing train schedules. While Assessment correctly notes that land uses immediately adjacent to the rail corridor in Sumner are industrial and commercial, it should also be noted that significant residential neighborhoods are very near the corridor as well. The timing of train passage through Sumner will have impacts not only on traffic associated with all land uses, but on the peace and repose of residents in their homes. The City cannot adequately understand these potential impacts without better information on train schedules.
2. The discussion of noise impacts within the assessment includes very little information on noise due to sounding of locomotive horns at crossings. The City requests additional data regarding the effect of more frequent and higher speed trains on the duration of train horn soundings and the total number of soundings in a given period. While the City notes brief mention of the possibility that wayside horns might be a mitigation technique that could be considered at certain crossings, a more detailed discussion of; the level of Amtrak or WSDOT participation in the cost of wayside horns; the general process that might be put in place to decide where wayside horns would be appropriate; and perhaps a general discussion of the types of criteria that could be developed to decide where

wayside horns should be placed, would greatly aid the City of Sumner's ability to respond to the Assessment.

3. While the Assessment generally indicates that trains would transit the corridor at higher speeds, there is no attempt to describe the potential range of speeds that might be possible under the Corridor Service Expansion Alternative. Additional information in this area would also be helpful to communities- including Sumner.

Once again, we appreciate the opportunity to comment. Good luck with your project.

Paul Rogerson, AICP
Community Development Director
City of Sumner

cc: Mayor Dave Enslow
John Doan, City Administrator
Bill Pugh, Public Works Director
Ryan Windish, Planning Manager



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October 22, 2009

Mr. Paul Rogerson, AICP
Community Development Director
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390-1423

Subject: Response to the City of Sumner comments on the Pacific Northwest Rail Corridor Program Environmental Assessment

Dear Mr. Rogerson:

Thank you for your letter of October 15, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

The purpose of this letter is to respond to the comments in your letter. In this letter, your paraphrased comments appear in italics, with responses in standard font.

Comment 1: The City requested information on the proposed train schedules of the future Amtrak Cascades rail service.

The proposed train schedules for the additional four southbound and four northbound trains show that the earliest a train would pass Sumner would be approximately 7:00 a.m., and the latest that a train would pass would be approximately 10:30 p.m. These proposed times are subject to approval by both BNSF and Amtrak. By comparison seven *Sounder* commuter rail trains pass through and stop in Sumner before 7:30 a.m. and the last Amtrak *Cascades* train currently is scheduled to pass through Sumner at about 9:00 p.m.

Comment 2: The City noted concern about potential noise impacts from locomotive horns at grade crossings as a result of more frequent and faster trains.

If funding is provided so that the projects identified in the Program EA can be constructed, there will be eight additional Amtrak trains passing Sumner each day. By comparison, currently there are 18 *Sounder* commuter trains, 10 Amtrak trains, and 40 freight trains passing through Sumner each week day on the Pacific Northwest Rail Corridor and 14 trains on the nearby Union Pacific rail line.

Mr. Paul Rogerson
October 22, 2009
Page 2

A more detailed discussion of noise mitigation measures is not appropriate for a program-level document. However, the use of wayside horns is one way to reduce noise, as is the reduction of the number of at-grade crossings through consolidation and closure or through the construction of grade separations. In the past, WSDOT has participated financially in the cost of grade separations on a project-by-project basis. Wayside horns are currently planned on one specific project, but will also be considered in the future, again on a project-by-project basis. One of the criteria for a noise mitigation measure is the proximity of sensitive receptors (e.g., hospitals, schools). Another is the proximity to locations where people sleep (residences and hotels).

Comment 3: The City also requested information on the potential range of speeds that might be possible under the Corridor Service Expansion Alternative.

The maximum speed that the Amtrak Cascades trains will achieve throughout the corridor is 79 miles per hour. Higher speeds will only occur in the improvement locations identified in the Program EA and then only up to that maximum of 79 mph.

Thank you again for your comments. I can be contacted at 360-705-7902 or at phinnee@wsdot.wa.gov should you have additional questions.

Sincerely,



Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

CITY of UNIVERSITY PLACE
3715 Bridgeport Way West ♦ University Place, WA 98466
Phone (253) 566-5656 ♦ FAX (253) 460-2541

October 19 2009

Ms. Elizabeth Phinney
Washington State Department of Transportation
P.O. Box 47407
Olympia, WA 98504-7407

RE: Pacific Northwest Rail Corridor NEPA Program Assessment

Dear Ms. Phinney:

Thank you for the opportunity to comment on the Program Assessment for the Pacific Northwest Rail Corridor. The City of University Place recognizes the importance of planning for the region's transportation demands today and into the future.

The City of University Place is primarily a residential community. A principal goal of our comprehensive plan is to protect existing single family neighborhoods from impacts associated with growth. The Pacific Northwest Rail Corridor Program Environmental Assessment indicates that Point Defiance Bypass will reroute existing Amtrak service through Tacoma's Nally Valley and Lakewood, bypassing the segment of BNSF rail line that runs under Point Defiance Park and along the University Place waterfront.

We understand that the bypass would eliminate Amtrak service on the Point Defiance rail line segment together with the associated volume, noise and safety concerns. However, the assessment does not address whether this would result in an increase in freight volume, speed, noise and associated safety concerns. While Amtrak trains are relatively short and quiet, freight trains tend to be longer and much louder.

Removing the Amtrak trains from the Point Defiance segment could result in significant impacts to the residential uses in proximity to the tracks. While these impacts may not make the residences unusable, an impact is significant if it significantly alters elements of the natural and built environment. If removing Amtrak service from the Point Defiance segment will result or likely result in higher freight volumes or speed the Environmental Assessment needs to address the associated impacts and discuss mitigation.

Please let us know if our concerns regarding increase volume or speed of freight trains on the Point Defiance segment are valid and if so how do you intend to address the potential significant adverse impacts. Should you have any questions regarding these comments, please do not hesitate to contact me at (253) 460-2519

Sincerely,

David Swindale

David Swindale
Planning and Community Development Director

Copy: City Council, Executive Staff



Washington State
Department of Transportation
Paula J. Hammond, P.E.
Secretary of Transportation

Transportation Building
310 Maple Park Avenue S.E.
P.O. Box 47300
Olympia, WA 98504-7300

360-705-7000
TTY: 1-800-833-6388
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October 22, 2009

Mr. David Swindale, Director
Planning and Community Development
City of University Place
3715 Bridgeport Way West
University Place, WA 98466

Subject: Response to the City of University Place comments on the Pacific Northwest Rail Corridor Program Environmental Assessment

Dear Mr. Swindale:

Thank you for your letter of October 19, 2009, providing comments on the Pacific Northwest Rail Corridor Program Environmental Assessment (EA).

The purpose of this letter is to respond to the comments in your letter regarding freight trains on the existing Point Defiance segment of the corridor.

Freight rail traffic in the future will continue to grow and contract, depending upon the economy, and is independent of the rerouting of the passenger trains. When intercity passenger trains are rerouted from the existing Point Defiance route to the Bypass route in the future, the existing freight rail traffic will continue to grow and contract as before. The speeds will remain the same due to the geography and railroad infrastructure in that area.

Please don't hesitate to contact Kevin Jeffers, our rail engineer, at 360-705-7982 or at jefferk@wsdot.wa.gov if you have technical questions regarding the current intercity passenger trains in your area. I can be reached at 360-705-7902 or at phinnee@wsdot.wa.gov.

Sincerely,

Elizabeth Phinney
Rail Environmental Engineer
State Rail and Marine Office

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