

# Pacific Northwest Rail Corridor

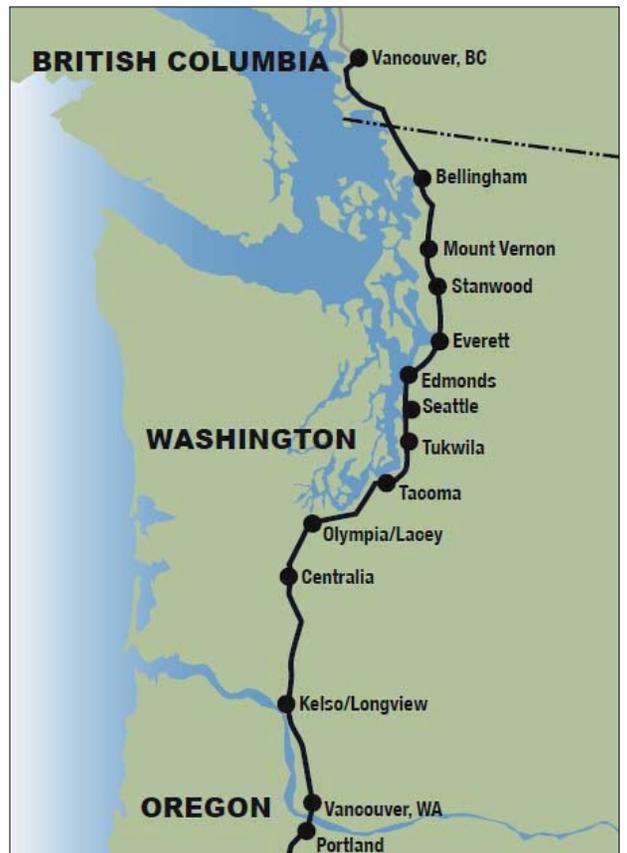
**Washington State  
Segment -  
Columbia River to the  
Canadian Border**

**Finding of No  
Significant Impact**

**November 2010**

**U.S. Department of Transportation  
Federal Railroad Administration**

**Washington State Department of  
Transportation**





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**Federal Railroad Administration**

Washington State Segment of the Pacific Northwest Rail Corridor - from the  
Columbia River to the Canadian Border

**FINDING OF NO SIGNIFICANT IMPACT**

Submitted pursuant to 42 U.S.C. 4332 (2)(c)

By the

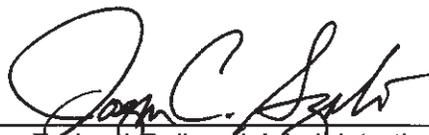
U.S. Department of Transportation  
Federal Railroad Administration

and

Washington State Department of Transportation  
State Rail and Marine Office

11/19/10

Date of Approval



for Federal Railroad Administration

The Washington State Department of Transportation (WSDOT) is proposing a program of infrastructure improvements along the existing 297-mile BNSF north-south main line between the Columbia River and the Canadian border that will initially allow for operation of four additional passenger daily round trips between Seattle and Portland (for a total of eight round trips), will help achieve greater schedule reliability, and will reduce the travel time between Seattle and Portland by up to 18 minutes. The proposed infrastructure improvements will also improve reliability for existing train service operating between Portland and Vancouver, B.C., and Seattle and Vancouver, B.C. The proposed improvements primarily follow the existing rail corridor to avoid and minimize impacts. Intercity passenger stops would be maintained at Bellingham, Mt. Vernon/Burlington, Stanwood, Everett, Edmonds, Seattle, Tukwila, Tacoma, Olympia/Lacey, Centralia, Kelso/Longview, and Vancouver, Washington. Maximum operating speed related to the corridor program would be 90 mph.<sup>1</sup> This finding of no significant impact is for the proposed service improvements and is being made at the Tier 1 level of review. It will be followed by additional studies that are required prior to implementation of the projects. Important issues identified by the public, review agencies, and the railroads include information needed in subsequent site-specific environmental documentation, location of future train stops, location of potential grade-separated crossings, and concern about animal-train collisions. This finding of no significant impact is conditioned on resolving these issues in subsequent site-specific environmental documentation so that no significant environmental impacts are associated with implementing the program. The analysis presented in the Tier-1 environmental assessment adequately discusses overall environmental issues and effects and supports a finding of no significant environmental impact for the proposed program of infrastructure improvements and the proposed service enhancement and meets the requirements of the National Environmental Policy Act.

<sup>1</sup> WSDOT has requested Federal funds from the Federal Railroad Administration's (FRA) High-Speed Intercity Passenger Rail Program to cover a substantial portion of the cost of the proposed program of passenger rail improvements.



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**Table 1** Summary of Potential Impacts

<b>Appendix A</b>	Comment Letters and Responses on the Tier-1 EA
<b>Appendix B</b>	Comment Letters and Responses on the Draft FONSI
<b>Appendix C</b>	High-Speed Intercity Passenger Rail Program Washington State Projects Considered for Funding

## I. Introduction

The Washington State Department of Transportation (WSDOT) proposes a program of railroad infrastructure improvements between the Columbia River and the Canadian border; a portion of the Pacific Northwest Rail Corridor (PNWRC) that is approximately 297 miles long and is located on the BNSF north-south main line in order to improve intercity passenger rail service by reducing travel times, achieving greater schedule reliability, and creating capacity for additional trip frequencies to accommodate growing intercity travel demand along the PNWRC in Washington State.

To achieve these goals WSDOT has applied for federal funding of the program through the High Speed Intercity Passenger Rail Program administered by the Federal Railroad Administration (FRA) and funded through the American Recovery and Reinvestment Act ("Recovery Act"). WSDOT's application under the Recovery Act was for a program of improvements, split into three Service Blocks, each adding incremental benefits to the PNWRC. At this time, the FRA is providing Recovery Act funding for a portion of the program of improvements, however, FRA has evaluated the environmental impact of the entire program of improvements, and the decision made in this FONSI covers all three Service Blocks. The specific projects that are being considered for funding at this time are identified in Appendix C. WSDOT prepared a Tier-1 Environmental Assessment (EA) in September 2009 to analyze the potential environmental effects of the improvements in Service Blocks 1, 2, and 3, that is consistent with FRA's guidance on Compliance with the National Environmental Policy Act (NEPA) in Implementing the High-Speed Intercity Passenger Rail Program, issued August 13, 2009 (which describes Service NEPA for corridor programs) and FRA's Procedures for Considering Environmental Impacts ("FRA Environmental Procedures") (64 FR 28545, May 26, 1999). Tiering is a concept encouraged by the Council on Environmental Quality (CEQ) in environmental impact assessment reviews so as to eliminate repetitive discussions of the same issues and focus on the actual issues ripe for decisions at each level of environmental review (see 49 CFR §1502.20 and §1508.28). Service NEPA addresses broader issues and likely environmental effects for the entire corridor relating to the type of service(s) being proposed, including cities and stations served, route alternatives, service levels, types of operations (speed, electric, or diesel powered), ridership projections, major infrastructure components, and identification of major terminal area or facility capacity constraints. For a major rail corridor improvement program, this type of environmental review is required before any substantial investments in the corridor are made. In this instance, WSDOT has prepared a Tier-1 service-level EA. Site-specific (or project) NEPA consists of Tier-2, site-specific environmental review that is appropriate to make a decision on implementing a specific project.

Prior to release of construction funding for individual projects, FRA and WSDOT will complete all appropriate site-specific (Tier-2) NEPA evaluation, documentation, and required determinations for component projects. The proposed infrastructure improvements of Service Blocks 1, 2, and 3 necessary to support the additional passenger service between the Columbia River and Canadian border have been thoroughly assessed in the Tier-1 EA; however, the extent and configuration of these infrastructure improvements will be refined during the final design process, and additional and site-specific information on impacts of the proposed action, where needed, will be provided in site-specific environmental documentation.

This finding of no significant impact (FONSI) based on the Tier-1 EA has been prepared to comply with the National Environmental Policy Act (NEPA), the FRA's Environmental Procedures and related laws. FRA has concluded that the award of Federal funds to implement the program of improvements to the Washington State segment of the PNWRC that are described as Service Blocks 1, 2, and 3 below, constitutes a major Federal action within the meaning of Section 102(c) of NEPA (42 U.S.C. 4321).

## **II. Purpose and Need**

In 1993, the Washington State Legislature determined that major intercity transportation corridors in the State were becoming increasingly congested. Population and employment were projected to increase 40 percent, and almost 50 percent, respectively, by 2013. This resulted in a seventy-five percent increase of the intercity travel demand forecast. Air travel, with heightened airport security, has become more challenging on the corridor since September 11, 2001. Highway traffic congestion on Interstate 5, which roughly parallels the entire PNWRC, is no longer restricted to peak times around major cities but has spread to areas and times that traditionally have not experienced traffic congestion. Additionally, intercity passenger rail service is recognized by state and federal policy-makers as a means to address 21<sup>st</sup> century public policy goals, which include reducing the nation's dependency on foreign sources of energy, reducing greenhouse gas emissions that contribute to climate change, increasing public safety, and strengthening transportation system redundancies in the event of natural and man-made disasters.

In order to expand service, reduce running times and improve reliability, constraints on the corridor must be addressed. In 2007, the number of freight and passenger trains averaged 49 per day between Vancouver, WA and Tacoma, WA; 60 per day between Tacoma and Seattle, WA; 41 per day between Seattle and Everett, WA; and as many as 28 per day between Everett and Blaine, WA. The existing rail line has a number of bottlenecks where freight train traffic is heavy, especially near terminals such as Vancouver, Kalama, Longview, and Tacoma. The heavy rail traffic in these areas restricts the number of passenger trains that can be operated. Further, scheduled running times are extended to allow for anticipated delays in these areas, but unanticipated delays at these locations still result in poor reliability.

To address the need for expanded passenger rail service, the WSDOT proposes a program of railroad infrastructure improvements between the Columbia River and the Canadian border; a portion of the PNWRC that is approximately 297 miles long and is located on the BNSF north-south main line. The railroad infrastructure improvements that make up the Washington State Segment of the PNRC—from the Columbia River to the Canadian Border—will address network congestion and capacity constraints.

## **III. Description of Alternatives**

Two alternatives were evaluated in the EA, the "No Build" and the "Corridor Service Expansion Alternative." The No Build Alternative analyzes what would happen if there are no further improvements on the corridor. The Corridor Service Expansion Alternative analyzes the effect of the service improvements described in Service Blocks 1, 2, and 3 below.

### **A. No Build Alternative**

If no further improvements are made to the PNWRC, then the rail capacity will remain at four round trips per day between Seattle and Portland, with one of those four trips continuing on to Vancouver, B.C., and an individual round trip between Seattle and Vancouver, B.C. As a result, seating capacity will remain limited and the average on-time performance will remain at 62 percent to 69 percent. On-time performance may degrade over time by increasing freight traffic on the shared rail corridor. Travel times between cities will remain the same as they are today; reduced use of fuel consumed by automobiles and commercial aircraft transporting intercity travelers will not be realized through these rail improvements; the anticipated reductions in greenhouse gas emissions generated by intercity auto and air travel will not be realized through increased levels of daily intercity passenger rail service; and mobility in the PNWRC may be constrained, making the region a less attractive location for businesses, which may relocate to areas with improved intercity passenger rail systems.

Even if no further improvements are made to the PNWRC, improvement projects funded by the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and state and local sources, and programmed in the 2009-2012 Statewide Transportation Improvement Program (STIP) for Washington State in the vicinity of the corridor will still be constructed. These projects include the construction of new bridges or replacement of existing bridges above the track in the corridor. These are both pedestrian as well as roadway bridges. Several of the projects programmed in the 2009-2012 STIP would separate vehicle and pedestrian traffic from rail traffic. In addition, BNSF will continue to perform maintenance on their rail line, regardless of any improvement projects.

### **B. Corridor Service Expansion Alternative**

The projects contained in the Corridor Service Expansion Alternative would result in increased service levels, improved on-time performance, and schedule reliability, and will allow for reduced travel times. The projects were grouped into three service blocks for funding applications that would provide incremental improvements to daily service levels, on-time performance, and schedule reliability between cities in the Pacific Northwest.

The projects listed below have been chosen to keep the freight operations on the rail system whole such that the increase in passenger service will not negatively impact freight service and operations. The resulting reduction in congestion of the rail network will allow an increase in passenger train frequency and reliability. In addition, the reduction in congestion will also improve the efficiency of the freight operations on the network. For example, at specific improvement locations, reduction in localized congestion for the benefit of the intercity passenger rail service may also improve the efficiency and safety of terminal freight switching operations.

The EA evaluated the following projects:

Service Block 1 projects would add one daily round trip between Seattle and Portland (for a total of five round trips) and would reduce the travel time between Seattle and Portland by six minutes. Projects would also improve reliability for existing train service operating between Portland and Vancouver, B.C., and Seattle and Vancouver, B.C.

- Tacoma – D to M Street Connection – Pierce County

1.2 miles of new railroad track from East D Street to South M Street in downtown Tacoma, including a new railroad bridge over Pacific Avenue, will be constructed for use by intercity passenger and commuter trains only.

- Tacoma – Point Defiance Bypass – Pierce County  
3.5 miles of second main track will be constructed from South 66<sup>th</sup> Street in Tacoma to south of Bridgeport Way in Lakewood; 10.5 miles of existing track will be reconstructed from Bridgeport Way in Lakewood to Nisqually Junction south of Mounts Road; and five at-grade crossings in Lakewood and DuPont will be improved.
- Vancouver – Yard Bypass Track – Clark County  
A new crew-change track and an additional connection between the east-west and north-south main lines will be provided along the east side of the existing rail yard, extending from Jefferson Street to Fruit Valley Road.
- Vancouver – New Middle Lead – Clark County  
A second connection between the east-west and north-south main lines will be provided along the yard lead track approximately from 11<sup>th</sup> Street to the Mill Plain Bridge over the rail yard.
- Vancouver – West Side Port Associated Trackage – Clark County  
Nearly 36,000 feet of new track and a new roadway bridge will be constructed on port property west of NW Gateway Avenue, north of the Columbia River, and south of NW Old Lower River Road.
- Cascades Corridor Reliability Upgrades – South – Clark, Cowlitz, Lewis, Thurston and Pierce counties  
Track quality improvements will be made at various locations on the main line between Nisqually Junction in Pierce County and the Columbia River at the southern border of Clark County.
- Cascades Corridor Reliability Upgrades – North – Snohomish, Skagit, and Whatcom counties  
Track quality will be improved at various locations on the main line between Everett in Snohomish County and Canada at the northern border of Whatcom County.
- King Street Station – Seismic Retrofit – King County  
The structural integrity of the King Street Station building at 303 S Jackson Street in Seattle will be strengthened to withstand earthquakes.
- Blaine – Swift Customs Facility Siding – Whatcom County  
A second siding track west of Portal Way from Loomis Trail Road to approximately Hall Road for freight trains awaiting U.S. Customs inspections near the Canadian border will be provided.
- Everett – Storage Track – Snohomish County

Two new receiving/departure tracks will be constructed northeast of Everett's Delta Yard between the bridges that carry Interstate 5 and State Route 529 over the rail yard.

- Amtrak Cascades – New Train Set – Corridor-Wide  
One new train set will be purchased.

Service Block 2 includes all the projects listed in Service Block 1 (with the exception of the purchase of one new Amtrak Cascades train set as described in Service Block 1) plus the projects listed below. Implementation of Service Block 2 projects would enable WSDOT and Amtrak to add a fifth and sixth daily round trip between Seattle and Portland and will reduce the travel time between these cities by 10 minutes. The projects also improve reliability for existing train service operating between Portland and Vancouver, B.C., and Seattle and Vancouver, B.C.

- Amtrak Cascades – New Train Sets – Corridor-wide  
Four new train sets will be purchased.
- Amtrak Cascades – High Speed Locomotives – Corridor-wide  
18 new, fuel-efficient, high-speed locomotives will be purchased.
- Advanced Signal System – Clark, Cowlitz, Lewis, Thurston, Pierce, King, Snohomish, Skagit, and Whatcom counties  
Prepare for a new train control system between locomotives, trackside signals, and road/rail crossings by converting relay interlockings to solid state interlockings at various locations on the main line between the Columbia River at the southern border of Clark County and Canada at the northern border of Whatcom County.
- Kelso to Martins Bluff – New Siding – Cowlitz County  
A new siding along the west side of the main line near the Port of Kalama from Toteff Road to just south of the Kalama River, along with other improvements, will be constructed.
- Kelso to Martins Bluff – Toteff Siding Extension – Cowlitz County  
A siding track will be extended about 0.9 miles south across Toteff Road and a new grade separation carrying Toteff Road over the siding, main line, and yard tracks will be constructed.
- Kelso to Martins Bluff – Kelso to Longview Junction – Cowlitz County  
A new 4.5-mile main line will be constructed along the east side of the existing main line, from the Kelso Amtrak Station to just north of Owl Creek, along with a new grade separation at Hazel Street in Kelso.
- King Street Station Track Upgrades – King County  
New tracks and interlockings will be added at King Street Station from South Royal Brougham Way to South Main Street to support additional daily trains, and two roadway structures near the station at South Jackson Street and 3<sup>rd</sup> Avenue Extension South will be rebuilt to accommodate the new tracks.

Service Block 3 includes all the projects in Service Blocks 1 and 2 (with the exception of the purchase of one new Amtrak Cascades train set which is replaced by the purchase of 18 new high-speed locomotives described in Service Block 2) plus the projects listed below. It will enable WSDOT and Amtrak to add a fifth, sixth, seventh and eighth daily round trip between Seattle and Portland, maintain a high level of schedule reliability, and reduce travel times between Seattle and Portland by up to 18 minutes. The Service Block 3 projects will also improve reliability for existing train service operating between Portland and Vancouver, B.C., and Seattle and Vancouver, B.C.

- Kelso to Martins Bluff – Kalama New Main Line – Cowlitz County  
This project adds 2.9 miles of new third main line track east of the existing main line near the Port of Kalama from Toteff Road to just south of the Kalama River.
- Bellingham Main Line Relocation – Whatcom County  
4,000 feet of track near Bellingham’s waterfront from East Pine Street to West Chestnut Street will be relocated eastward, and a new Cornwall Avenue roadway bridge over the realigned tracks will be constructed.
- Everett Curve Realignment – Snohomish County  
From Pacific Avenue and Chestnut Street to just north of the Snohomish River in Everett, the main line will be realigned, the signal system improved, and the mechanical portions of the Snohomish River Bridge upgraded.
- Centralia – Station Modifications – Lewis County  
This project constructs a second platform east of the main lines between East Main Street and East Maple Street and a passenger overcrossing over the main tracks at Centralia Union Station.
- King Street Station Renovation – King County  
The passenger, baggage, and adjoining offices in Seattle’s King Street Station building at 303 South Jackson Street will be restored to accommodate higher volumes of rail travelers.
- Tukwila Station – King County  
A passenger waiting shelter will be added at Sound Transit’s commuter station at 2100 Longacres Drive Southwest in Tukwila and an Amtrak Cascades passenger information system will be installed at nearby Seattle-Tacoma International Airport just south of Seattle and west of Tukwila.
- Vancouver Port Access – Clark County  
New east-west tracks will be constructed from approximately West 7<sup>th</sup> Street and Jefferson Street in Vancouver, beneath the BNSF north-south main line as it crosses the Columbia River, to approximately West 26<sup>th</sup> Avenue in the Port of Vancouver.
- Tacoma Trestle Replacement – Pierce County  
A single track functionally-obsolete timber trestle will be replaced with a modern multiple track structure and retained earth fill from East L Street to west of East G Street in Tacoma.

#### IV. Public Involvement

A Tier-1 EA was prepared in September, 2009 for improvements to the PNWRC in Washington State that evaluates the program of improvements. WSDOT posted the EA on its website on October 2, 2009, and requested that all written comments be received via e-mail or post mail by October 19, 2009. Additionally, notice of the EA and the comment due date were posted on the Washington State Environmental Policy Act Register on October 5, 2009. Due to agency requests, the comment period remained open until 12:00 p.m. on October 23, 2009. The EA was also sent via mail to federal, state, and local agencies, military bases, ports, tribes, and city and county governments located along the rail line. Thirteen agencies submitted written comments on the EA. No individuals provided written comments on the EA. Agency concerns included future site-specific analysis, the deadline for the comment period, location of future train stops, location of potential grade-separated crossings, and wildlife/train collisions. The comment letters are shown in Appendix A along with WSDOT's response to issues raised. In addition to requesting public comment on this EA, WSDOT has engaged the public during the completion of planning studies and environmental projects for rail development along the PNWRC.

Beginning in 1992, WSDOT published its High Speed Ground Transportation Study and the Pacific Northwest Rail Corridor was designated as one of the five original high speed rail corridors by the FRA. WSDOT has worked with local governments and the public in the development of the rail corridor through both corridor-wide rail studies, as well as site-specific environmental documents. The proposed improvements that make up this program were presented in the 2006 "Washington State Long-Range Plan for Amtrak Cascades" and the 2008 "Amtrak Cascades Mid-Range Plan." Historically, when projects received funding WSDOT interacted with Federal agencies, freight railroad companies, state regulatory and resource agencies, local governments, tribes, and the public to allow for participation in the development of site-specific documentation.

WSDOT has prepared site-specific environmental documentation for projects within Service Blocks 1, 2, and 3. These include:

- Vancouver Rail Project – NEPA/State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS). The project, located in southwest Washington, would eliminate conflicts between freight trains and passenger trains in the heavily-congested Vancouver Rail Yard. The Federal Highway Administration (FHWA) was the lead federal agency and FRA was a cooperating agency in the EIS process. The Final EIS was issued in May 2003, and FHWA's Record of Decision was issued in August 2003. The proposed project was reevaluated pursuant to NEPA in 2008, led by FHWA and included FRA as a cooperating agency. The first two phases of the project, funded with FHWA and state monies, are currently under construction. FRA will issue a NEPA decision before funding construction of additional phases of the Vancouver Rail Project.
- Kelso-Martin's Bluff Rail Project – NEPA/SEPA Preliminary Draft EIS. In 2001, WSDOT began the development of a NEPA/SEPA EIS for the Kelso-Martin's Bluff Rail Project with FRA and FHWA as co-lead Federal agencies. This project would have eliminated freight and passenger train conflicts near the Columbia River ports

of Kalama and Longview. The environmental documentation only proceeded as far as a preliminary draft EIS due to state budget limitations and legislative direction.

- D to M Street Connection – NEPA/SEPA EIS. In 2002, the FTA and Sound Transit prepared an EIS for the Lakewood to Tacoma Commuter Rail and SR-512 Park and Ride Expansion project, which included the improvements from D to M Street. FTA issued a Record of Decision (ROD) for Lakewood to Tacoma Commuter Rail and SR-512 Park and Ride Expansion project in December 2002. The improvements are described in the 2002 ROD consist of the “development of an approximately 1.2 mile segment of new track between East “D” Street and South “M” Street in the City of Tacoma. This new connection, which will be built primarily within City of Tacoma right -of-way, will be designed and built in accordance with Federal Rail Administration requirements.” Subsequent changes in the design required Sound Transit and FTA to prepare a NEPA Reevaluation, which was issued in November 2007. The design changes consisted of a grade-separated crossing of Pacific Avenue to address limited rail capacity, safety concerns, and increased congestion. In 2009, Sound Transit competed for FRA funding to support the completion of the project and, as such, prepared an EA for the proposed D to M Street Connection. FRA issued a FONSI for the D to M Street project in December 2009. The project is currently being advertised for bids, but has not yet begun construction. While this project is within the limits of this environmental document, it has its own independent utility and logical termini. The construction of this project is not contingent upon the completion of any other part of the proposed undertaking.
- Point Defiance Bypass Rail Project – FHWA and WSDOT prepared a NEPA Documented Categorical Exclusion (DCE) for this project in 2008. The NEPA DCE was also adopted under SEPA as a Determination of Nonsignificance (DNS). This project would build, reconstruct, or rehabilitate approximately 18 miles of track that bypasses the BNSF main line around scenic Point Defiance. The first phase of construction is underway with funding from FHWA and other non-FRA sources. FRA will issue a NEPA decision before funding construction of the Point Defiance Bypass Rail Project.
- WSDOT has completed seven crossovers and three siding upgrades since 2000 along the PNWRC in Washington State. These projects had state funding only; thus, the environmental documents were SEPA DNSs. Two siding extensions, where required NEPA/SEPA environmental documents have been completed, will soon start construction. For one of the siding extension projects, the U.S. Army Corps of Engineers was the lead Federal agency due to wetland impacts. For the other siding extension project, FHWA was the lead Federal agency due to a grade crossing closure associated with the project.

For the Vancouver Rail Project, the Kelso-Martin’s Bluff Rail Project, and the Point Defiance Bypass Rail Project, WSDOT reached out to the communities through scoping letters and meetings, public notices, community open houses, and agency and tribal meetings. At least 25 people attended each open house. Community and agency concerns expressed were for safety, noise, and access.

To facilitate public access, each project will have a communications plan to address three main audiences: media relations, government relations and community relations. The choice of tools and the extent they are used will vary with the size and potential impacts of each improvement and the amount of interest by each of the three types of audiences. WSDOT may use e-mails, press releases, newsletters and, in some cases, open houses, to keep media, government officials and the community informed of the improvements being planned and their progress. At a minimum for all projects, WSDOT develops individual project web pages that include the project description and location map, contact information, and all public outreach materials and environmental documents. Periodic updates on each web page are posted on a monthly basis. The address where all project web pages are listed is <http://www.wsdot.wa.gov/projects/>.

#### **A. Outreach to Native American Tribes**

In Washington State, Native American Tribes have determined their areas of interest for WSDOT projects. When a project is proposed, the affected Tribes are consulted on a government-to-government basis. This WSDOT consultation occurs either as a Section 106 consultation or as a Governor's Executive Order 05-05 consultation (which is similar to a Section 106 consultation and is required for all state-funded capital construction projects). FRA initiated formal government-to-government consultation in a letter sent to potentially interested tribes on or around August 18, 2010. FRA will continue to meet its government-to-government consultation responsibilities during the project-level environmental process and at the request of individual tribes. In general, tribes are concerned about any effects to their usual and accustomed fishing, hunting, or sacred places, as well as any known archaeological sites or the potential of encountering unknown cultural resources. To address their concerns, a cultural resources report/survey is completed for every project, and an inadvertent discovery plan is required for all project construction.

### **V. Summary of Impacts**

The program of infrastructure improvements described in the EA occurs in selected areas along the 297-mile Pacific Northwest Rail Corridor on the BNSF north-south main line from the Columbia River to the Canadian border. The majority of the projects are located entirely within the existing BNSF right-of-way, which varies in width along the corridor from 100 feet to over 200 feet. The following section outlines the anticipated impacts, by resource area, of the proposed PNWRC service improvement program as analyzed in the Tier-1 EA.

The corridor assessment of potential environmental effects began in the late 1990s when discipline reports and GIS mapping were completed to support the Environmental Overview of the corridor and the long-range plan for the Amtrak Cascades. For this Tier-1 EA, the environmental information and the GIS mapping were both updated to reflect any changed conditions along the corridor.

The GIS mapping was completed using a custom GIS application built to access over 60 layers of environmental or natural resource management data. This application is an ArcView extension that provides tools for locating transportation projects and displaying the environmental data for that location. The resource areas that were mapped for the EA were hydrology, hazardous sites, flood zones, wetlands, threatened and endangered species, air quality, parks, national register listed historic properties, generalized slope stability, urban

growth areas, global warming / sea level rise model, and census data. The buffer area used to analyze each resource to help identify potential impacts ranged from 1,000 to 2,000 feet. The broad buffer areas allow for avoidance and minimization during subsequent NEPA studies. Actual impacts would be reduced based upon the footprint of the final design. Site-specific studies could include additional analysis of noise and vibration, air quality, traffic and transportation, wetlands, streams/ivers, floodplains, fish, wildlife, vegetation, endangered species, hazardous materials, cultural resources, social and economic, Environmental Justice populations, energy, land use/farmlands, utilities, and visual quality.

Table 1 (attached to this FONSI) provides a summary of the potential effects of the proposed program of improvements. The impacts of the proposed improvements will be mitigated below the level of "significant" as demonstrated in the environmental commitments section of this FONSI. The context and significance of the impacts are described by resource area below.

#### **A. Waterways and Hydrological Systems**

As a part of the service improvements program, new rail crossings would be constructed over the Coweeman River, Schoolhouse Creek, and some unnamed streams; rail improvements would be constructed directly adjacent to the Columbia River, Vancouver Lake, Burnt Bridge Creek, Cowlitz River, Kalama River, Owl Creek, China Creek, and the Snohomish River; between 15 and 20 acres of fill would be placed in floodplains (including wetlands and non-wetlands) in Clark, Cowlitz, and Snohomish counties; and there would be less than 5 acres of additional impervious areas outside the existing developed rail line in Clark, Cowlitz, Lewis, Pierce, King, Snohomish, and Whatcom counties. With appropriate mitigation as described in Section V.A. below, it is anticipated that the impact of the service improvements program on the waterways and hydrological systems will be less than significant.

#### **B. Hazardous Materials**

Any potential impact from hazardous materials can be avoided, minimized or mitigated. A survey completed during the EA found a total of 7 Superfund sites, 401 state cleanup sites, and 781 leaking underground storage tank sites within a 2,000 foot buffer along the rail corridor. The potential for permanent impacts exist if pre-existing contaminated soil or ground water is not properly managed and allowed to spread to clean soil or surface or ground water. However, with the proper mitigation and management protocols, this risk will be substantially diminished well below the level of significant impact. With appropriate mitigation as described in Section V.B. below, the potential impact from hazardous materials as a result of the service improvements will be less than significant. Site-specific environmental documentation will further evaluate the potential for hazardous material issues and will include appropriate mitigation measures as discussed in Environmental Commitments.

#### **C. Biological Resources/Ecology**

In the case of fill or cut areas, especially near streams or wetlands, moderate impacts to fisheries, vegetation, and wildlife could be expected. In these areas, critical, suitable or available habitat for species could be lost or modified in ways that limit usability by species. It is anticipated that the service improvement projects could create between 8 and 12 acres of wetland fill in Cowlitz County and between 1 and 2 acres of wetland fill in Snohomish County. It is anticipated that the improvement projects could affect between 18 and 25

acres of vegetation and wildlife sites in Clark, Cowlitz, Lewis, Pierce, King, Snohomish, and Whatcom counties. It is anticipated that the improvement projects could affect less than one river mile of fish designated critical habitat within Schoolhouse Creek and the Coweeman River in Cowlitz County. With appropriate mitigation as described in Section V.C. below, the service improvements impact on biological resources will be less than significant.

**D. Air Quality**

Using Mobile 6 modeling, previous studies, and taking into account future regulations and trends, the General Conformity<sup>2</sup> air quality analysis that was performed for the service improvements and associated rail operations indicates that the level for each criteria pollutant would not exceed the National Ambient Air Quality Standards (NAAQS) *de minimis* level of emissions. As such, this analysis confirms that the rail program's increased operations conform to the purpose and intent of the State Implementation Plans and Maintenance Plans for achieving the NAAQS.

With the provision of faster and more reliable service, the increase in ridership will result in a decrease in auto fuel used and emissions from passenger vehicles, as diesel-powered passenger trains use less fuel and have lower emissions than the equivalent number of passenger highway vehicles. The improvements are expected to result in the following changes in emissions and number of auto trips/gallons of fuel used, annually:

	<b><u>NAAQS de minimis Level<sup>3</sup> (tons/year)</u></b>	<b><u>First Year (2018)</u></b>	<b><u>Fifth Year (2022)</u></b>	<b><u>Tenth Year (2027)</u></b>
Reduced Auto Trips		476,269	507,182	555,425
Reduced Gallons of Fuel		1,932,032	2,037,617	2,204,422
Change in NOx Emissions (tons)	100	38.1	27.7	13.7
Change in PM Emissions (tons)	100	0.9	0.2	-0.3
Change in VOC Emissions (tons)	100	-28.8	-26.4	-28.1
Change in CO2 Emissions (tons)	n/a	-26,910	-29,020	-32,246
Change in SO2 Emissions (tons)	100	-0.6	-0.7	-0.7

The major air quality impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. However, site-specific investigations will determine if the effects of construction of the proposed program of improvements on air quality and appropriate mitigation measures will be identified and implemented.

**E. Soils and Geology**

None of the proposed improvements are located near unstable slopes so the potential of impacts to unstable slopes is small. Liquefaction (ground failure due to earthquakes) is possible in portions of the corridor. Thus, the potential for sections of track to be dislocated is possible during an earthquake. Faster and more frequent trains will increase the

<sup>2</sup> 40 CFR 51 and 93

<sup>3</sup> These rates apply in maintenance areas.

frequency of vibration and may increase the risk of liquefaction and track damage in any areas of liquefaction-prone soils. Erosion impacts during construction in Clark, Cowlitz, Lewis, Pierce, King, Snohomish, and Whatcom counties are primarily related to the increased potential for erosion resulting from exposure of excavated soils to water. If not controlled, such erosion could result in the deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water. It is also likely that soils could be tracked onto nearby paved roads by construction vehicles and wind action over exposed soils could generate dust. However, WSDOT will employ appropriate mitigation as described in Section V.E. below to reduce the potential for these occurrences, thus the potential impacts to soils and geology will be less than significant.

#### **F. Land Use**

Overall, the intercity passenger program is compatible with existing locally-approved comprehensive plans and policies. Some impacts may result from the addition of rail facilities in Clark, Cowlitz, and Whatcom counties. All efforts will be made to keep the project limits within the railroad's current right-of-way. However, it will not be possible to avoid work off the existing rail right-of-way in all situations. It is likely that between 10 and 15 acres of land will be converted from its present use to rail-related use in these three counties. In addition, if a wetland mitigation bank is not available, some land may be converted from its present use to wetland mitigation in Snohomish and Cowlitz counties (see Item G. Farmlands). State, regional, and county plans throughout the corridor have incorporated the Amtrak passenger rail service (and its associated facilities) into their comprehensive plans. Many other jurisdictions have also recognized the rail service in their plans, especially in the cities of Vancouver, Kelso, Lacey, Tacoma, Tukwila, Seattle, Edmonds, Everett, Mt. Vernon, and Bellingham, which all have train stations. With appropriate mitigation as described in Section V.F. below, the service improvements impact on land use will be less than significant.

#### **G. Farmlands**

Impacts to farmlands will be minor, because most of the new tracks will be constructed inside the existing railroad right-of-way. Between three and five acres of farmland used as pastures for small resident farms in suburban Kelso in Cowlitz County may be displaced by related roadway improvements. If a wetland mitigation bank is not available, some farmland may be converted to wetlands as mitigation for wetland impacts adjacent to the existing right-of-way in Cowlitz and Snohomish counties. The amount and location of the farmland converted to wetland mitigation will vary depending on consultation with the permitting agencies, but would likely not exceed a total of 15 acres in Cowlitz and Snohomish counties. The effects on farmlands will be minimized. Recent state law (RCW 47.01.305) directs WSDOT to use public lands before using land designated as agricultural land of long-term commercial significance. If public lands are unavailable, RCW 47.01.305 directs WSDOT to make every effort to avoid using lands designated as agricultural lands of long-term commercial significance.

#### **H. Parks and Cultural Resources**

The addition of rail improvements such as new sidings, bypasses, or additional main lines could potentially impact parks and cultural facilities. Such impacts could affect a cultural resource or change access to a park or recreation facility. None of the improvements proposed in the Corridor Service Expansion Alternative appear to be near enough to existing parks or known cultural resources to result in impacts. Based on this information,

the PNWRC improvements will not result in the use of any properties protected under Section 4(f) of the Department of Transportation Act of 1966 49 U.S.C. § 303. However, site-specific investigations will further evaluate if there is any potential to affect these resources by the proposed program of improvements consistent with FRA's obligations under Section 4(f). With appropriate mitigation as described in Section VI.H. below, it is anticipated that the service improvements impacts on parks and cultural resources will be less than significant.

### **I. Social and Economic**

Potential effects of faster and more frequent passenger trains on community cohesion could result from increased train traffic along the line and from construction of associated facilities. Construction of bypass tracks and additional main lines could potentially disrupt neighborhoods and businesses by changing access. Increased rail service is not expected to require the relocation of any homes or businesses. It is not anticipated that these trains will result in levels of noise or vibration that will make homes or businesses adjacent to the railroad tracks unusable. With appropriate mitigation as described in Section V.I. below, the service improvements impact on the social and economic environment will be less than significant. Site-specific investigations will be conducted to determine more specific, or potential additional mitigation measures to minimize potential impacts to the social and economic environment.

### **J. Visual Quality**

Most railroad improvements will occur within the existing right-of-way, where track and supporting structures already exist. Additional railroad facilities will comprise an incremental change that will be unnoticeable in most locations. Overall, there is not expected to be any change in visual quality as of a result of the PNWRC service improvement program.

### **K. Energy**

A primary goal of the rail program is to reduce the existing bottlenecks in the rail system. This will result in an overall decrease in travel time. Additional fuel efficiency will be realized with the use of the new models of locomotives being built for this route in the future, which are assumed to be at least 10 percent more fuel efficient than the existing locomotives. Current total consumption of fuel for Amtrak Cascades rail passenger service is approximately 3,200 gallons per day or approximately 1.17 million gallons per year. With the planned rail improvements for Amtrak Cascades service expansion and using new locomotives, fuel use is projected to increase to 4,212 gallons per day, for a net increase of approximately 1,000 gallons per day or approximately 365,000 gallons per year. Local supplies of diesel fuel will not be impacted by these improvements.

With the increase in faster and more reliable service, the increase in ridership will result in a decrease in auto fuel used, as diesel-powered passenger trains use less fuel than the equivalent number of passenger highway vehicles. The improvements are expected to reduce the use of automobile fuel by the following amounts annually, based on Amtrak ridership data:

	<u>First Year (2018)</u>	<u>Fifth Year (2022)</u>	<u>Tenth Year (2027)</u>
Reduced auto trips	476,269	507,182	555,425
% Reduction in auto trips at I-5 <sup>4</sup>	3.0%	3.1%	3.2%
Reduced gallons of auto fuel <sup>5</sup>	1,932,032	2,037,617	2,204,422
Reduction in diesel fuel used	365,000	365,000	365,000
Net reduction in equivalent energy in gallons of diesel fuel	1,337,230	1,430,257	1,577,222

#### L. Noise

A general noise and vibration analysis was conducted for the corridor using the guidance provided by the Federal Transit Administration (FTA) manual. Existing freight noise and vibration levels, and the noise and vibration that will be added from each improvement (and associated increases in the number of passenger trains), were predicted at the nearest sensitive receiver to the tracks. WSDOT determined that noise and vibration levels are already high throughout the program corridor due to existing freight operations and the proximity to the existing Interstate-5 highway corridor. The analysis found that the proposed rail improvements will not noticeably add to the existing levels of noise or vibration in these areas, or result in noise or vibration exceeding the FRA criteria for severe impacts for all the improvement areas studied. Further, site-specific noise and vibration analyses will be conducted where appropriate for projects within the program of improvements. With appropriate mitigation as described in Section V.L. below, the potential noise and vibration effects that could result from the service improvements will be less than significant.

#### M. Transportation

The projects proposed that will allow the additional four round trips between Seattle and Portland, OR will be designed to create rail system capacity such that there will be no increase in freight rail congestion and the existing level of passenger service on the corridor will not be negatively affected. The additional passenger trains will have a positive impact on vehicle traffic congestion on the parallel route of Interstate 5 when people choose to ride the trains rather than drive to destinations near I-5.

Eight highway-rail grade crossings in Clark, Cowlitz, Snohomish, and Whatcom counties will be closed, and six grade separations will be constructed in Clark, Cowlitz, Pierce, Snohomish and Whatcom counties. Other remaining at-grade crossings on the corridor will experience as many as eight more passenger trains per day, which will delay vehicle traffic at those crossings slightly more than today. Safety concerns at highway-rail grade crossings will be addressed at the project level and with appropriate mitigation as described in Section V.M. below; the potential impacts will be less than significant.

There will be temporary transportation delays associated with the construction of traffic circulation improvements. These traffic improvements could include construction of wider

<sup>4</sup> Based on 2009 traffic data collected on Interstate 5 at MP44.3 between Portland and Seattle, as a representative location, using growth rate of 1.5% annually.

<sup>5</sup> Note: 1 gallon of diesel fuel equals 1.1305 gallons of auto fuel (gasoline)

traffic lanes, additional bicycle lanes, and new or more accessible pedestrian facilities. Also, brief traffic delays will occur when the existing crossings are improved with the installation of safety improvement devices, including flashing lights and gates.

A project in Cowlitz County may be near enough to a local airport that it may exceed the Federal Aviation Administration (FAA) Part 77 Obstruction Standard. Design considerations for this project will take this potential obstruction into account in order to avoid or minimize the impacts to the local airport. If impacts cannot be avoided, FAA regulations for obstructions will be followed.

#### **N. Environmental Justice**

The corridor service expansion avoids and minimizes potential impacts to minority and low income populations by following the existing route. The wide range of variability in the demographics of census tracts along the corridor suggests that neither low-income nor minority populations would predominately bear the effects of the program.

Increased rail service would not result in substantial noise level increases or violations of ambient air quality standards, or other environmental health hazards. It is possible that if homes or businesses are displaced, one or more could be owned by a member of a protected population, but the overall numbers of displacements will be small, and relocation assistance would be provided in accordance with federal and state law. The rail program will provide mobility benefits to all users.

Corridor service expansion would not likely involve any disproportionately high and adverse impacts to populations protected by the Environmental Justice Executive Order 12898. Subsequent site-specific analysis will verify compliance.

#### **O. Solid Waste Disposal**

WSDOT or its contractor will properly dispose of any solid waste generated as a result of project construction, such as land clearing or construction debris, in accordance with state regulations (Washington Administrative Code (WAC) 173-304, Minimum Functional Standards for Solid Waste Handling). With appropriate mitigation as described in Section V.O. below, potential impacts of solid waste generation as a result of the service improvements will be less than significant.

#### **P. Coastal Zone Management**

Any project that is located within a Coastal Zone county and needs a Section 401 Water Quality Certification has to comply with the Coastal Zone Management Program and obtain a Determination of Federal Consistency from the Washington Department of Ecology (Ecology), the agency that manages the program in Washington State. Under Washington's Program, federal activities that affect any land use, water use, or natural resource of the coastal zone must comply with the enforceable policies within the six laws identified in the program document. These six laws are: the Shoreline Management Act (including local government shoreline master programs), the State Environmental Policy Act (SEPA), the Clean Water Act, the Clean Air Act, the Energy Facility Site Evaluation Council (EFSEC), and the Ocean Resource Management Act (ORMA).

The Pacific Northwest Rail Corridor runs through six coastal zone counties (out of 15 counties with marine shorelines), but only the Everett Curve Realignment project (on the

east side of the Delta Rail Yard) will need a federal consistency determination. The project is expected to receive concurrence from Ecology that it is consistent with the tenets of the Coastal Zone Management Program. With this mitigation as described in Section V.P. below, the service improvements impact on coastal zones will be less than significant.

**Q. Use of Other Natural Resources, such as Water, Minerals, or Timber**

There will be no extraction of water, minerals, or timber as a result of the rail projects described in the EA.

**R. ADA Accessibility**

The intercity passenger trains currently used on the PNWRC are accessible for elderly and disabled passengers, and the new Amtrak Cascades train sets will be equally accessible. The access for wheel chair-bound or others who are unable to climb stairs will be provided by mechanical lifts mounted to the train set, as today, or by portable loading lifts on each platform. Station facilities, which are generally owned by local public agencies, are also accessible for elderly and disabled users. With appropriate mitigation as described in Section V.R. below, the service improvements impact on ADA accessibility will be less than significant. In fact, the impact should be an improvement given that the increased frequency of train service will provide additional transportation options for elderly and disabled passengers.

**S. Indirect and Cumulative Effects**

Indirect effects are those that are "caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable" (40 CFR 1508.8). Cumulative effects are impacts which result from the incremental consequences of an action when added to other past and reasonably foreseeable future-actions (40 CFR 1508.7). Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.

The proposed program of improvements is consistent with locally-approved land use plans. New development around station areas could occur; however, it would not be wholly attributable to the proposed program of improvements. Improvements at King Street, Tukwila, and Centralia stations that are part of this program are not likely to induce development in the vicinity of the stations as they are primarily rehabilitation efforts or station capacity improvements. Local governments, through a public land use zoning process, could designate a transit-oriented development zone around a train station. If this re-zoning and development occurs, it would be focused in urban areas, and could be beneficial, providing additional housing and business opportunities that use less land and reduce auto trips as compared to typical development.

According to the Washington State Long-Range Plan for Amtrak *Cascades*, It is anticipated that by the year 2023, travel on Amtrak *Cascades* from Seattle to Portland will increase to 23 trains per day with over one million individuals utilizing the service per year (February 2006, 3-4). Sound Transit's commuter rail program (*Sounder*), was integrated into the *Cascades* planning process in the early 1990s, though development of the *Sounder* program is independent of the *Cascades* service. This integration ensures consistency between the two programs, individual improvements identified, and service plans. Additionally, capacity analyses incorporate Sound Transit, WSDOT, and BNSF's projected needs. As each project in the proposed program of improvements progresses in

development, WSDOT will ensure that supporting infrastructure is in place to address the potential increases in ridership.

Increased frequency of service and speed that would be achieved through implementation of the proposed program of improvements would not cause changes in population density or development patterns that were not already occurring. Rather, the program of improvements would give area residents more travel options resulting in increased ridership and fewer cars on the roads. Further, each modal shift will incrementally help meet Washington's policy goals for the reduction of greenhouse gas emissions and climate change. Those goals are: 1990 GHG levels by 2020; 25 percent reduction below 1990 levels by 2035; and 50 percent by 2050.

The proposed program of improvements will likely result in roughly 15 to 20 acres of fill placed in floodplains (including wetlands and non-wetlands), and one or two new rail bridges built over the Coweeman River. Permitting processes that will occur and site-specific environmental analyses that will be conducted will include specific design and mitigation requirements to ensure the actions conform to federal regulatory requirements. Similarly, the mitigation outlined in this FONSI include BMPs and other measures, such as bridge design that will not impede fish passage, to reduce the effects of the proposed improvement on the natural environment, including those that would occur only temporarily as a result of the construction process. Therefore, these impacts would not indirectly or cumulatively contribute to resource degradation.

Beneficial indirect effects that are anticipated as a result of the elimination of railroad bottlenecks and the addition of new rail capacity include improved air quality as delays and locomotive idling time decreases. The new locomotives that will be purchased to support the increased trip frequency will be at least 10 to 12 percent more energy-efficient than the current locomotives. This improved efficiency means that less fuel will be used, thus reducing GHG emissions.

WSDOT will work with BNSF and others to identify transportation infrastructure, including rail lines, highways, seawalls, and more, that could be vulnerable to sea level rise as a result of climate change. If vulnerable sections of the PNWRC rail corridor are identified, actions will be recommended to protect rail and other vital transportation infrastructure as well as protecting communities and public safety. Possible strategies to address vulnerabilities include raising rail berms or building bridges to span inundated areas.

According to the 2009-2012 Statewide Transportation Improvement Program (STIP) for Washington State, there are 8 planned projects in the vicinity of the corridor that have federal, state, and local funding sources. These include three new vehicle bridges planned in Edmonds (Edmonds Crossing Multimodal Terminal, a regional project), Renton (Southwest 27<sup>th</sup> Street / Strander Boulevard Connection (Phase 2)), and the Port of Ridgefield (Pioneer Street Rail Overpass), resulting in the closure of four existing at-grade crossings (two in Edmonds and two at the Port of Ridgefield); the new Lakewood Station Connection, which is a new pedestrian bridge at Lakewood over the proposed Point Defiance Bypass rail line; bridge replacements in Everett (Broadway Bridge Replacement Project) and Bellingham (Waterfront Bridges – Cornwall Bridge); the I-5: Portland Avenue to Port of Tacoma Road – Northbound High Occupancy Vehicle (HOV) and the I-5: Portland Avenue to Port of Tacoma Road – Southbound HOV, which is a project that includes two

new HOV bridges in Tacoma planned for Interstate 5; and the Downtown Vancouver Waterfront Access Project- a street underpass of the BNSF rail line in downtown Vancouver on the rail line that proceeds east from the PNWRC.

Elements of the project development process for the STIP projects are programmed to occur within the next 4 years and could include overlap of construction activities with the proposed improvements along the PNWRC in Washington State that will be implemented prior to September 30, 2017. However, BMPs and other mitigation measures included in this FONSI and included in WSDOT construction protocols will be implemented to ensure concurrent construction projects that could occur in proximity to one another along the rail line will not result in a cumulative adverse effect on area resources. The STIP projects will reduce the number of at-grade crossings along the PNWRC in Washington State, increase safety by reducing the likelihood of vehicle-train collisions, facilitate pedestrian access to either side of the rail line, and will mean less noise from train horns for the surrounding communities. The Downtown Vancouver Waterfront Access Project will improve access to the historic Amtrak station in Vancouver and is located in proximity to larger redevelopment opportunities proposed by the City of Vancouver, converting former heavy industrial use along the waterfront to mixed use. In conjunction with the proposed improvements along the PNWRC in Washington State, the STIP projects would lessen the effect of additional frequencies along the rail line to surrounding communities.

The two new HOV bridges in Tacoma planned for Interstate 5, located adjacent to existing bridges on the freeway over the PNWRC would facilitate the flow of vehicle traffic through this congested area and contribute along with the proposed improvements along the PNWRC in Washington State, to improved regional air quality.

## **VI. Environmental Commitments**

The determination that implementation of the PNWRC program of improvements will not have a significant impact on the environment is predicated on a number of commitments made by WSDOT to protect the environment. These environmental commitments address the potential impacts of the program in Washington State. The Corridor Service Expansion Alternative was evaluated in the Tier-1 Environmental Assessment, dated September 2009. These environmental commitments summarize practicable means to avoid or minimize environmental harm from the improvements.

The environmental commitments are arranged by resource area. The following discussion indicates when the commitment should be implemented and who would have jurisdiction to assure fulfillment for each commitment.

### **A. Waterways and Hydrological Systems**

1. WSDOT will design physical improvements to meet standard engineering practices to avoid and minimize impacts to floodplains and hydrological connection of waterways.
2. WSDOT will ensure that the engineering design and facility construction is consistent with applicable regulatory requirements for protection of water resources. WSDOT will ensure that temporary water quality impacts that could occur during construction over and adjacent to waterways would be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western

Washington, and city and county grading/drainage ordinances and Best Management Practices (BMPs), as appropriate.

3. For construction sites disturbing more than one acre, WSDOT or its contractor will comply with the requirements of the National Pollution Discharge Elimination System (NPDES) stormwater construction permit and stormwater pollution prevention plan.
4. WSDOT will use BMPs during construction of the proposed program of improvements. These BMPs may include use of temporary barricades, fencing, and/or flagging to contain project-related impacts to the construction area and avoid impacts beyond the project footprint; returning areas disturbed (outside of the ROW) to their preconstruction contours to the extent practicable; and reseeding or replanting with native vegetation within one growing season following construction to provide permanent stabilization and minimize the potential for erosion; using contaminant-free embankment and surface materials; and using the appropriate BMPs in proximity to perennial waters.
5. WSDOT shall consider in project-level documentation the current water quality, including any impaired streams under CWA Section 303(d); any Total Maximum Daily Load (TMDL) analyses completed, underway or planned; and how anti-degradation requirements would be met for those streams that are meeting state water quality standards or are considered high quality waters.
6. WSDOT will obtain Federal permits required by Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act, from the U.S. Army Corps of Engineers prior to initiation of applicable project-related construction activities. WSDOT also agrees to obtain a 401 Water Quality Certification that is required for projects that include filling wetlands to verify that water quality standards will not be violated. (The 401 Water Quality Certification will be issued in conjunction with the U.S. Corps of Engineers Section 404 permit for wetland fill.)
7. As specific design refinements are made for individual projects, WSDOT will consider the use of elevated track (trestles, etc) or other methods to avoid or minimize floodplain fill in areas within the Snohomish River and Cowlitz River floodplains.
8. Prior to construction, WSDOT shall complete jurisdictional delineations of wetlands that are subject to Section 404 of the Clean Water Act for all proposed railroad facilities. WSDOT shall mitigate project-related unavoidable impacts to waters of the United States, including wetlands, in accordance with the requirements of permit (s) obtained from the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act.
9. WSDOT shall disturb the smallest area practicable around any streams and, as soon as practicable following construction activities, revegetate disturbed areas outside of the right-of-way using native vegetation. EPA approved BMP's will be utilized to minimize disturbances to these areas.
10. WSDOT shall design bridges and culverts to maintain existing water patterns and flow conditions as required by any appropriate permits.

**B. Hazardous Materials**

11. For construction projects that extend beyond the rail line and the rail berm, WSDOT will prepare a hazardous materials report. This report will identify and evaluate known or potentially contaminated sites in the project area that may affect the environment during construction, create significant construction impacts, and/or incur cleanup liability for WSDOT.
12. If hazardous materials are identified on a project site, WSDOT will develop the appropriate mitigation to properly manage pre-existing contaminated soil or ground water so that it does not spread, and so that clean water does not come into contact with contaminated stockpiled soil. WSDOT shall coordinate with the lead agency(ies) to ensure that project activities do not adversely affect any ongoing hazardous waste site cleanup activities.
13. For property acquisition, WSDOT will conduct a Phase I Environmental Site Assessment to evaluate the potential for the presence of contamination on or adjacent to a specific property. A Phase II Environmental Site Assessment, which characterizes soil and groundwater, may be performed if recognized conditions exist for a site.
14. WSDOT will include provisions for an environmental consultant in construction contract specifications for projects where hazardous materials are found on the project site. WSDOT will ensure that the contractor complies with the requirements for handling contaminated materials.
15. Prior to initiating any project-related construction activities, WSDOT or its contractor shall develop a Spill Prevention, Control and Countermeasures (SPCC) Plan for petroleum products or other hazardous materials, as required by applicable Federal and state regulations. During construction, any encountered materials presenting environmental risk would be handled according to construction specifications and the SPCC Plan that will be in place.
16. During construction, WSDOT or its contractor shall follow all applicable Federal regulations and standard protocols for transporting hazardous substances and other deleterious compounds to minimize the potential for a spill occurrence near or adjacent to water bodies.
17. WSDOT will require that contractor(s) dispose of waste generated during project-related construction activities in accordance with applicable and reasonable Federal, state, and local regulations.
18. If unanticipated sources of hazardous or regulated materials are encountered during project-related construction activities, WSDOT or its contractor will immediately notify the Washington Department of Ecology and stop all work in the area until a corrective action plan has been approved. Handling, treatment, and disposal of any hazardous materials would be conducted by WSDOT or its contractor in full compliance with Federal, state, and local requirements.

**C. Biological Resources/Ecology**

19. WSDOT will undertake design refinements during final design and as documented in subsequent environmental documents to avoid sensitive ecological areas and minimize impacts to aquatic resources and wetlands.
20. For unavoidable impacts to wetlands, mitigation will include one or more of the following: enhancing existing wetlands, restoring degraded wetlands, creating new wetlands in non-wetland areas, or purchasing wetland mitigation bank credits. Enhancement of existing wetlands within the immediate project area would likely involve eradicating invasive plant species and planting native vegetation.
21. In Snohomish County and other counties with a legacy of supporting land in agricultural production, where wetland mitigation could include converting farmland to wetland as compensation, WSDOT will coordinate with the agricultural community to ensure minimization of impacts to important farmlands while also mitigating for wetland impacts.
22. Prior to construction, WSDOT will collaborate with Federal and state resource agencies to identify means to minimize railway/wildlife impacts, which could include appropriate siting, design, and construction of effective wildlife crossings. Where bridges or large culverts are installed for water body crossings, these could be enlarged to facilitate movement of terrestrial species.
23. WSDOT will obtain Federal and state permits and authorizations for impacts to the habitat of Federally-protected species. Permit stipulations will be incorporated into the construction contract specifications.
24. WSDOT will coordinate with Federal and state resource agencies prior to the final design process to identify opportunities to avoid, minimize, mitigate, or compensate for unavoidable permanent impacts to critical, suitable, or available habitat. WSDOT will locate construction and staging areas outside of Federal or state-designated critical/sensitive habitats where possible, and consider developing a plan for targeted habitat improvements.
25. For all proposed crossings of fish-bearing waters incorporating culverts, WSDOT will design said structures in accordance with all reasonable requirements of Federal and state regulations (e.g., Endangered Species Act of 1973 and Washington State Hydraulic Code, Chapter 77.55 RCW (Revised Code of Washington)). In addition, WSDOT shall use the most recent fish utilization information from the Washington Department of Fish and Wildlife GIS database to determine the presence of fish in each water body.
26. In project locations where the rail corridor separates bluff areas from Puget Sound, WSDOT will, based upon consultation with resource agencies, investigate and consider the use of hydraulic structures, such as oversized culverts, to allow sediment to pass under the rail line and reach Puget Sound, as material transport is necessary to avoid major changes in supply and associated changes in beach and habitat suitability.
27. As determined during subsequent site-specific environmental evaluations, WSDOT will minimize adverse effects to salmon during critical life stages when practicable for any in-

water work in anadromous streams. WSDOT will incorporate timing windows into construction contract specifications for in-stream work. In addition, WSDOT will design and construct stream crossings so as not to impede fish passage or impair the hydrologic functioning of the water body.

28. WSDOT or its contractor will implement standard BMPs to minimize impacts to vegetation during project-related forest clearing, including minimizing construction vehicle traffic in areas where excessive soil compaction and rutting would cause erosion, and using low ground pressure construction vehicles to minimize disruption to soil.

#### **D. Air Quality**

29. WSDOT will include specifications to comply with Federal and state air quality regulations to cover temporary construction conditions such as dust and smoke emissions in the construction contract.
30. To minimize fugitive dust emissions created during project-related construction activities, WSDOT or its contractor will implement appropriate fugitive dust suppression controls, such as spraying water or other established measures, and operating water trucks on haul roads where possible to reduce dust.
31. To limit project-related construction emissions, WSDOT will work with its contractor(s) to ensure that construction equipment is properly maintained and that required pollution-control devices are in working condition.
32. While it has been demonstrated at the Tier 1 level that the proposed Corridor Service Alternative would not exceed the NAAQS *de minimis* levels for criteria pollutant emissions, site-specific investigations will be conducted to determine the air quality status of the project area and to determine if air quality could be adversely impacted during construction of the proposed improvements.

#### **E. Soils and Geology**

*Note: Several of these mitigation strategies would be included in the NPDES Stormwater Construction Permit required to begin construction activities (see environmental commitments for waterways and hydrological systems).*

33. Where steep slopes are unavoidable in cut and fill sections, WSDOT will minimize the disruption of soils and apply current soil stabilization techniques, such as retaining walls, where practicable. As a last resort, WSDOT will cut back steep slopes to a reasonable angle so that future landslide risk is minimized.
34. WSDOT or its contractor will properly prepare the subgrade and compact the embankment to reduce the risk of liquefaction and track damage in any areas of liquefaction-prone soils.
35. WSDOT or its contractor will mitigate potential erosion during project construction by the use of BMPs specified in the erosion and sedimentation control plans for the project, as required by state and local jurisdictions.

36. WSDOT or its contractor will re-establish vegetation in non-paved cleared areas as soon as possible and apply appropriate ground cover to minimize the potential for erosion hazards.

#### **F. Land Use**

The conversion of up to 15 acres of land that is not currently in use for rail-related activities would likely occur as a result of the construction of the proposed program of improvements within Clark, Cowlitz, and Whatcom counties. These conversions of land would occur along the existing transportation corridor and/or in areas that are recognized in local comprehensive plans for rail-related use. No long-term impacts to land use are anticipated to result from the proposed operational improvements that will allow for faster and more frequent intercity passenger trains. WSDOT will implement the following measures to minimize temporary disruptions during construction:

37. WSDOT will maintain a website providing information on each funded project, including the status of any site specific environmental documentation, construction schedule, funding, and contact information.
38. WSDOT will address concerns about fragmentation of neighborhoods and farm properties by maintaining the connectivity of major roadways where possible and working with local residents on specific right-of-way acquisition issues.
39. WSDOT will make reasonable efforts to minimize disruptions to utilities by scheduling project-related construction work and outages to low-use periods. WSDOT will notify residents and other utility customers in advance of project-related construction activities requiring temporary service interruptions.

#### **G. Farmlands**

Impacts to farmlands will be minor, because most of the new tracks will be constructed inside the existing railroad right-of-way. These potential impacts would likely occur in Cowlitz and Snohomish counties where farmland may be converted to wetlands for mitigation purposes, if a wetland mitigation bank is not available. The amount of farmland conversion would likely not exceed a total of 15 acres. No loss of access to properties is anticipated to result from faster and more frequent intercity trains and its associated project improvements. See suggested environmental commitments related to agricultural land under Biological Resources/Ecology.

#### **H. Parks and Cultural Resources**

WSDOT will conduct additional project investigations to determine if unidentified site-specific impacts may occur to parks and cultural resources as the proposed project designs are refined, as follows:

40. During subsequent site-specific environmental documentation, WSDOT will consult with affected Native American Tribes, the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation, and agencies with jurisdiction over the land that could be affected by the proposed improvements to comply with Section 106 of the National Historic Preservation Act and Section 4(f) of the US Department of Transportation Act. WSDOT will work with FRA and other interested federal agencies to

ensure compliance with Section 106 and Section 4(f). Project specific MOA's may be developed as the site specific processes develop.

41. If the potential to affect cultural resources as a result of the proposed improvements is determined during site-specific analysis, WSDOT will develop protocols to inform and prepare construction supervisors of the importance of protected archaeological resources, graves, and other cultural resources and how to recognize and treat the resources. An unanticipated discovery plan will be developed for each project.

#### **I. Social and Economic**

42. If additional right-of-way is needed, WSDOT will evaluate the effects of the additional land acquisition during site-specific environmental documentation. WSDOT will conduct project-related right-of-way acquisition in conformance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601 et seq.).
43. To address safety concerns, WSDOT is working with local communities up and down the corridor to improve, close and consolidate grade crossings and educate the public about the dangers of railroad trespassing. In addition, the volunteer group, Operation Lifesaver, provides extensive community education and outreach about grade crossing safety and the dangers of trespassing on railroad property.
44. WSDOT will consider traffic-related improvements for the Tillicum neighborhood in Lakewood, which is separated from the roadway network by the existing rail line, such as improved coordination of traffic signals when a train is or is not present near the grade crossings. Similar traffic-related improvements will also be considered for other residential areas where community cohesion could be affected by the proposed improvements.

#### **J. Visual Quality**

45. Following construction, WSDOT will return lands outside of the rail right-of-way to near pre-existing conditions, where possible, for most improvement sites. Further, WSDOT or its contractor will dispose of excess construction material in a suitable fill location and will not cast it on downhill slopes.
46. Where new rail bridge structures will be added, specifically at the Coweeman River crossing in Kelso, WSDOT will design the new bridge alongside the existing structure, thus minimizing the visual impact.
47. At locations where there will be new roadway bridges over the tracks, the design of the new bridges will be coordinated by WSDOT with local government and the general public to minimize the visual impact of the new structures.
48. At locations where new retaining walls will be added, WSDOT will design the visible surface of the retaining walls to minimize the visual impact by modifying the surface color and texture to resemble natural rock surfaces or by adding a vegetation buffer to shield it from view.

49. WSDOT will replace removed vegetation with native vegetation and locate vegetative buffers beneficial to the visual quality along portions of the improvement sites where cuts or fills have occurred within sight of residential viewers and outside of the right of way, and where it does not attract wildlife species that could be involved in wildlife/train collisions.

#### **K. Energy**

No adverse impacts to energy are anticipated to result from project improvements to allow for faster and more frequent intercity passenger trains; thus, no mitigation is proposed.

#### **L. Noise**

The need for mitigation is based on the magnitude of impact and consideration of factors specifically related to the proposed improvement and affected land uses. Noise and vibration impacts will be further investigated during site-specific environmental reviews for those projects that have the potential to cause adverse effects. Every reasonable effort will be made to reduce predicted noise and vibration to levels deemed acceptable for impacted sensitive land uses.

50. If impacts exceed FRA severe criteria for vibration impacts, WSDOT will consider track improvement measures such as resilient tie pads and resilient fasteners to avoid or minimize vibration impacts.
51. If impacts exceed FRA severe criteria for noise impacts, WSDOT will consider specific noise abatement measures, such as train wheel maintenance, installing continuous welded rail, reducing train speed, installing supplementary safety measures, and working with affected communities for the designation of "Quiet Zones," or other measures. WSDOT will be responsible for completing noise and vibration analyses and finalizing mitigation commitments with local communities during site-specific environmental reviews.
52. WSDOT will work with its construction contractor(s) to minimize, to the extent practicable, construction-related noise disturbances near residential areas by specifying acceptable working hours in construction contract documents. Construction and maintenance vehicles will be in good working order with properly functioning mufflers to control noise.

#### **M. Transportation**

WSDOT will complete additional analysis of traffic and transportation impacts for each project for which at least one public at-grade crossing is proposed to have one or more tracks added, trains speeds across it increased, or the crossing closed to vehicles with or without grade separation.

53. The at-grade crossings within the limits of the proposed projects will be improved with wider traffic lanes, the addition of bicycle lanes, and new or more accessible pedestrian facilities. These crossings will also be upgraded to modern active warning standards, including flashing lights, gates, and predictive circuitry. Crossings with predictive circuitry will adjust the activation of the flashing lights and gates such that the delay for vehicles stopped at a crossing is nearly the same for both slow-moving and fast-moving

trains. WSDOT will also consider traffic-related improvements, such as improved coordination of traffic signals when a train is or is not present near the grade crossings.

54. Where improvements to at-grade crossings are likely to result in temporary traffic delays and periodic lane and/or access revisions during construction, WSDOT will coordinate with local governments and communities to minimize construction impacts.

55. WSDOT will develop a traffic control plan for each project that includes, but is not limited to, the following measures: at least one lane will be kept open at crossings except for short periods of limited duration when new track and new crossing surface panels are being installed at the grade crossings; flaggers and/or signs will be in place when lanes are closed; detour signs will be placed when routes are closed; a uniformed officer will be required at locations where traffic signals will be countermanded; and traffic control plans will be developed in conjunction with the respective roadway authorities.

#### **N. Environmental Justice**

Corridor service expansion would not disproportionately affect populations protected by Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Increased rail service would not result in high and adverse noise level increases or violations of ambient air quality standards, or other environmental health hazards.

It is possible that if homes or businesses are displaced, one or more could be owned by a member of a protected population. The overall numbers of displacements will be small, as the majority of the program would occur within existing rail right-of-way, and relocation assistance would be provided in accordance with federal and state law. The corridor service expansion would benefit protected populations by providing improved and more reliable intercity transportation.

#### **O. Solid Waste Disposal**

56. WSDOT will properly dispose of any solid waste generated as a result of project construction, such as land clearing or construction debris.

#### **P. Coastal Zone Management**

57. For those projects that are located in Whatcom, Skagit, Snohomish, King, Pierce, and Thurston counties (six of the 15 coastal zone counties in Washington State), WSDOT will comply with the Coastal Zone Management Program, managed by the Washington Department of Ecology.

#### **Q. Use of Other Natural Resources, such as Water, Minerals, or Timber**

There will be no extraction of water, minerals, or timber as a result of the rail projects described in the EA.

#### **R. ADA Accessibility**

The intercity passenger trains currently used on the PNWRC are accessible for elderly and disabled passengers, and the new Amtrak *Cascades* train sets will be equally accessible. Station facilities, which are generally owned by local public agencies, are also accessible for elderly and disabled users.

58. The access for wheel chair-bound or others who are unable to climb stairs will be provided by mechanical lifts mounted to the train set, as today, or by portable loading lifts on each platform.
59. Accessibility at stations will be maintained during construction and once the improvements are complete.

## VII. Errata

### A. Errata to the Environmental Assessment

The following corrections apply to the Tier-1 EA for the program level corridor improvements to the PNWRC, issued by WSDOT on October 2, 2009. These corrections serve to clarify, update, or enhance the readability of the EA. These corrections do not alter the conclusion of No Significant Impact. Changes to the EA are identified by page number and paragraph. New text is indicated by an underline. The comment letters on the Tier-1 EA are included as Appendix A.

#### **Page 1-6, Service Block 3 Proposed Projects, after paragraph 1.**

The project called "Centralia -- Station Modifications" was omitted from the list of projects in Service Block 3 in the Tier-1 EA. However, the impacts and the mitigation for this Station project were included in the analysis of impacts, Chapter 5, Impacts and Mitigation, of the Tier-1 EA. Potential effects of the proposed program of improvements are described by the county in which they occur. The Centralia station modifications project is located in Lewis County, which is included in the discussion of impacts by resource area in Chapter 5 of the Tier-1 EA. Other than signal system improvements and track quality improvements, there are no other projects included in this program that occur in Lewis County.

The following text is added:

- Centralia – Station Modifications – Lewis County  
This project constructs a second platform east of the main lines between East Main Street and East Maple Street and a passenger overcrossing over the main tracks at Centralia Union Station.

#### **Page 1-4, after Paragraph 2.**

The following text is added.

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 specific projects, none of which address potential future station stops. WSDOT commits to exploring potential station stops, including one in particular at Auburn, as plans for expanded service are developed. (This will be done through collaboration with Puget Sound Regional Council, Amtrak and the host railroad, Sound Transit, and City of Auburn and in consideration of the State-studied Diesel Multiple Unit service). If necessary, a similar approach would be used when examining potential station stops elsewhere. Locations will be evaluated through various methods in the future including a business case analysis and any environmental analysis required under federal or state laws.

**Page 7-2.**

The following text is added.

HDR Engineering, Inc. Washington State Department of Transportation, Cascades Track 2 Projects, High-Speed Intercity Passenger Rail (HSIPR) Program, Cost Benefit Analysis & Economic Impact. September 30, 2009.

PSRC (Puget Sound Regional Council). 2006. 2007–2010 Regional Transportation Improvement Program. September 2006.

. 2007. Destination 2030 Update: Metropolitan Transportation Plan for the Central Puget Sound Region. April 2007.

. 2008. VISION 2040. April 2008. Accessed online July 25, 2009 at [www.psrc.org](http://www.psrc.org).

. 2009a. Transportation 2040 Draft Environmental Impact Statement. Seattle, Washington May 2009. Available online at: <http://psrc.org/transportation/t2040/t2040-pubs/trans2040-deis>

. 2009b. Central Puget Sound Regional 2007-2010 Transportation Improvement Program. Available at: <http://www.psrc.org/projects/tip/currenttip/index.htm>.

Revised Code of Washington, Chapter 47.79, High Speed Ground Transportation. Section 47.49.01, Legislative Declaration. 1993.

**Page 7-4.**

The following text is added.

Current updated information was used including September 2009 GIS layers and data for all mapping and data analysis and personal review and correspondence with WSDOT environmental experts.

**B. Errata to the Draft FONSI**

The sections of this FONSI titled “solid waste disposal,” “coastal zone management,” “use of other natural resources, such as water, minerals, or timber,” “ADA accessibility,” and “transportation” are resource headings that did not appear in the Tier-1 EA prepared by WSDOT for the proposed program of improvements. These resource areas were analyzed in the Tier-1 EA but were not explicitly identified by resource heading and appear in this FONSI because FRA’s environmental procedures explicitly identify these topics as aspects of potential environmental impacts that should be considered. This FONSI states the potential impacts and mitigation measures for the above-mentioned topics that are conditions of this decision document.

Solid waste disposal and the use of other natural resources such as water, minerals, or timber are not addressed in the Tier-1 EA as the proposed program would not have major affect on solid waste disposal and there will be no extraction of water, minerals, or timber as a result of the proposed program of improvements. Waste is discussed in the EA in the

context of construction waste materials/construction debris, and the potential to affect existing hazardous waste sites during construction. Section O and Q of this FONSI include a discussion of solid waste and the use of other natural resources, respectively.

A discussion of coastal waters is included in the Tier-1 EA under “waterways and hydrological system” and compliance with the Coastal Zone Management Act will be required as a condition of a construction permit in coastal zones. Section P of this FONSI presents the coastal counties that could be affected by the proposed program of improvements and compliance with the Coastal Zone Management Act.

Access concerns and changes in vehicular and pedestrian access were addressed in the Tier-1 EA; however, access for elderly and disabled passengers as protected under the Americans with Disabilities Act (ADA) was not explicitly stated. Section R of this FONSI addresses station and train ADA accessibility.

Potential effects of the proposed program of improvements on transportation were addressed in the Tier-1 EA in the context of access and delay at rail-road crossings. A discussion of potential construction impacts in the Tier-1 EA that could result with implementation of the proposed program of improvements included the potential for delay of access at existing rail-road crossings. The community cohesion and safety discussion in the Tier-1 EA addresses the potential disruption of traffic in neighborhoods and businesses where there is the possibility of permanently changing access to residences and facilities. Section M of this FONSI addresses potential effects to transportation and mitigation measures.

Since the posting of the Draft FONSI for the proposed program of improvements for public and agency review, FRA has made minor edits and clarifications to the text of the FONSI that were not requested or included as comments from agencies or the public. Specifically, these errata include edits to the following environmental commitments: Nos. 8, 9, 10, 20, 26, and 40; as well as errata to Section IV. Public Involvement, and Sections V. A, V.C, V.H, and V.S of the Draft FONSI.

The following errata were made in response to comments received on the Draft FONSI that was issued by FRA on July 8, 2010. Changes to the Draft FONSI are identified by page number and paragraph. New text is indicated by an underline. See Section VIII for details on the comments received.

**Page 18, Waterways and Hydrological Systems, after environmental commitment No. 4.**

The following text is added.

5. WSDOT shall consider in project-level documentation the current water quality, including any impaired streams under CWA Section 303(d); any Total Maximum Daily Load (TMDL) analyses completed, underway or planned; and how anti-degradation requirements would be met for those streams that are meeting state water quality standards or are considered high quality waters.

**Page 19, Hazardous Materials, edit to environmental commitment No. 11.**

The following text is added.

12. If hazardous materials are identified on a project site, WSDOT will develop the appropriate mitigation to properly manage pre-existing contaminated soil or ground water so that it does not spread, and so that clean water does not come into contact with contaminated stockpiled soil. WSDOT shall coordinate with the lead agency(ies) to ensure that project activities do not adversely affect any ongoing hazardous waste site cleanup activities.

**Page 13, Energy, after paragraph 2.**

The following text is added.

With the increase in faster and more reliable service, the increase in ridership will result in a decrease in auto fuel used, as diesel-powered passenger trains use less fuel than the equivalent number of passenger highway vehicles. The improvements are expected to reduce the use of automobile fuel by the following amounts annually, based on Amtrak ridership data:

	<b><u>First Year</u></b> <b><u>(2018)</u></b>	<b><u>Fifth Year</u></b> <b><u>(2022)</u></b>	<b><u>Tenth Year</u></b> <b><u>(2027)</u></b>
Reduced auto trips	476,269	507,182	555,425
<u>% Reduction in auto trips at I-5<sup>4</sup></u>	<u>3.0%</u>	<u>3.1%</u>	<u>3.2%</u>
Reduced gallons of auto fuel <sup>5</sup>	1,932,032	2,037,617	2,204,422
Reduction in diesel fuel used	365,000	365,000	365,000
Net reduction in equivalent energy in gallons of diesel fuel	1,337,230	1,430,257	1,577,222

<sup>4</sup> Based on 2009 traffic data collected on Interstate 5 at MP44.3 between Portland and Seattle, as a representative location, using growth rate of 1.5% annually.

<sup>5</sup>Note: 1 gallon of diesel fuel equals 1.1305 gallons of auto fuel (gasoline)

**VIII. Comments on the Draft FONSI**

This FONSI was issued by FRA for public review on July 8, 2010 for a period of 30 calendar days (75 FR 39325, July 8, 2010). Six comments on the draft FONSI were received, including comments from one federal agency, two state agencies, and three local governments. A summary of and responses to the comments are provided below. The comment letters on the Draft FONSI are included as Appendix B.

Federal Agency comments:

**Letter from EPA, Region 10 to Elizabeth Phinney, WSDOT dated August 11, 2010 (assigned EPA number: 09-063-FRA)**

Comment topics: Wetlands/water quality, wildlife, planning and development, and air quality modeling

*Water Resources Comments:*

- EPA recommends that the final decision and project-level documentation should consider current water quality, including any impaired streams under CWA Section 303(d); any Total Maximum Daily Load (TMDL) analyses completed, underway or

planned; and how anti-degradation requirements would be met for those streams that are meeting state water quality standards or are considered high quality waters.

- EPA notes that WSDOT must comply with CWA Section 404(b)(1) Guidelines.
- EPA noted they are the authorizing agency for discharges to waters of the U.S. from stormwater under the NPDES permit and CWA Section 401 water quality certification on Tribal land.

*Response:*

- FRA has included an environmental commitment (No. 5) to address EPA's concerns regarding current water quality and anti-degradation requirements.
- Environmental commitment No. 8 reiterates the requirement to comply with CWA Section 404. This includes compliance with Section 404(b)(1) Guidelines.
- There are no impacts expected on Tribal lands as a result of the proposed program.

*Biological Resources Comments:*

- EPA recommended specific mitigation measures to address project-level requirements to reduce impacts to habitat and aquatic species.
- EPA recommended project-level coordination with the Washington Department of Fish and Wildlife, National Oceanic and Atmospheric Administration (NOAA), and the National Marine Fisheries Service (NMFS) and incorporate any terms and conditions that may result from consultation.
- EPA recommended their previous comments/concerns incorporated into the project-level NEPA process (see Appendix A for EPA comment letter on the Tier-1 EA).

*Response:*

- EPA's suggested minimization and avoidance measures to reduce impacts to habitat and aquatic species are addressed in the following environmental commitments. Other strategies to minimize and avoid impacts will be considered as necessary during project-level NEPA analysis.
  - Bridge crossings: see environmental commitments Nos. 1 and 10.
  - Limited construction period to avoid impacts to sensitive species: see environmental commitment Nos. 19, 23, 24, and 27.
  - Utilize BMPs: see environmental commitment Nos. 2, 4, and 27.
  - Maintain or improve water quality for streams in project area: see environmental commitment No. 5.
- Coordination and consultation will occur with both state and federal regulatory agencies as indicated in environmental commitments Nos. 22-24. This will include consultation with the Washington Department of Fish and Wildlife, NOAA, NMFS, and USFWS, when applicable.
- FRA has incorporated EPA's suggested environmental commitment as No. 22 of this FONSI and will be applied to the project-level NEPA process, where applicable.

*Hazardous Materials Comments:*

- EPA recommended that WSDOT and FRA coordinate with the appropriate lead agency where contamination is known to be present early in the planning process regarding contaminated sites and clean up actions to ensure the project would not adversely affect cleanup activities. Project-level documentation should include delineation of the extent of contamination, the agency managing the site, and the status of remedial action or site assessment where impacts may occur.

*Response:*

- FRA has added details to environmental commitment No. 12 to address agency coordination as part of the project-level NEPA documentation process to ensure the project would not adversely affect any ongoing hazardous waste site cleanup activities.

*Sustainable Communities Comments:*

- EPA requested the analysis consider how increased rail service may induce further growth and affect regional planning efforts, and consider and integrate multi-modal access to rail stations in order to potentially further reduce emissions. EPA also recommends WSDOT coordinate with local municipalities surrounding rail stations to collaborate on current and future transportation and development planning.
- EPA recommended that the projects that make up the program of improvements should be consistent with U.S. Department of Housing and Urban Development (HUD), DOT, and EPA's Interagency Partnership for Sustainable Communities and its 6 Livability Principles.

*Response:*

- FRA has addressed the program's potential to induce growth and affect regional and local planning efforts in Section S of this FONSI, Indirect and Cumulative Effects. New development around station locations could occur; however, it would not be wholly attributable to the proposed program of improvements. The proposed program of improvements is consistent with locally-approved land use plans. Regional planning entities, such as the Puget Sound Regional Council, consider how multi-modal travel options can affect regional plans. Moreover, WSDOT has considered the proposed improvements in their long-range and mid-range plans for the Amtrak *Cascades*.
- FRA's HSIPR program, which has provided funding for the proposed program of improvements, is consistent with the Livability Principles of the HUD, DOT, and EPA Interagency Partnership for Sustainable Communities. Improvements to the PNWRC will improve service to stations in established communities, therefore enhancing both connectivity and livability.

*Air Quality Modeling Comments:*

- EPA requested references to support the statements regarding population increases stated in the Tier-1 EA.

Federal Railroad Administration  
Environment & Systems Planning

- EPA recommended including percent reduction in addition to number of reduced auto trips and gallons of fuel so that the predicted reduction could be better understood when comparing to a baseline. EPA recommended that project-level analyses include references to air quality modeling results and literature used for the effects determination.

*Response:*

- The requested references to support statements regarding population increases are included in Section VII. Errata, of this FONSI.
- FRA has included the percent reduction in auto trips in Section V.K Energy of this FONSI. A location along Interstate 5 that is representative of the PNWRC between Seattle and Portland was used to approximate intercity travel between the two metropolitan areas and estimate the percent reduction in auto trips along Interstate 5 as a result of the proposed program of improvements. WSDOT 2009 traffic volumes were obtained and an annual growth rate of 1.5% was included in the calculation.
- Air quality modeling that is conducted for projects that make up this program of improvements will include a description of the methods of analysis.

State Agency comments:

**Letter from Southwest Clean Air Agency to Elizabeth Phinney, WSDOT dated July 22, 2010**

Comment topics: Asbestos, construction dust, new source review of air pollution sources

*Asbestos (SWCAA Regulation 476) Comments:*

- The Southwest Clean Air Agency noted the asbestos abatement requirements if a structure is demolished or renovated.

*Response:*

- As explained in the environmental commitments for Hazardous Materials, WSDOT will determine if hazardous materials, such as asbestos, are present, and identify appropriate mitigation to properly manage the site (see environmental commitments Nos. 11, 13, and 16). If Asbestos or other hazardous/regulated materials are found during construction, WSDOT or its contractor shall follow federal (40 CFR Part 61 Subpart M National Emission Standards for Asbestos) and state (SWCAA 476 Standards for Asbestos Control) requirements regarding its handling, treatment, and/or disposal.

*Construction Dust (SWCAA Regulations 400-040) Comments:*

- The Southwest Clean Air Agency noted the requirements to minimize fugitive dust that potentially could be generated by construction activities.

*Response:*

- As stated in environmental commitment Nos. 29 and 30, WSDOT or its contractor shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions.

*New Source Review of Air Pollution Sources (SWCAA Regulations 400-109,110)*

*Comments:*

- The Southwest Clean Air Agency noted the SWCAA's General Regulations which regulate the installation and/or modification of any building, structure, or facility that emits or may emit an air contaminant.

*Response:*

- Environmental commitment No. 32 indicates that WSDOT will determine if construction of the proposed improvements could cause an adverse impact to air quality. If WSDOT installs or modifies any building, structure, or facility that creates a new or increased source of air contaminants, as per SWCAA Regulations 400-109, 110 WSDOT or its contractor shall obtain an Air Discharge Permit.

**Letter from Washington Department of Ecology to Elizabeth Phinney, WSDOT dated August 9, 2010**

Comment topics: Shorelands/wetlands, toxics cleanup, waste 2 resources

*Shorelands/Wetlands Comments:*

- Ecology suggested planning now for advanced mitigation for wetland impacts which will occur in different watersheds and jurisdictions. Mitigation site selection should be done at a watershed scale.

*Response:*

- Environmental commitment No. 8 charges WSDOT with mitigation of unavoidable impacts to waters of the United States in accordance with the requirements of Section 404 of the Clean Water Act, which requires that impacts are further identified and defined as the projects proceed through the design and environmental clearance processes. A decision as to the type of permitting and mitigation requirements will be made in consultation with the permitting agency

*Toxics Cleanup Comments:*

- Ecology requested township, range and section (T.R.S.) information be provided for each individual project when State Environmental Policy Act (SEPA) environmental documents are submitted for review.

*Response:*

- The requested information pertaining to township, range, and section will be provided to the Washington Department of Ecology when specific project environmental documentation is submitted for review.

*Waste 2 Resources Comments:*

- Ecology recognized that the Service NEPA EA is a planning document, and that individual projects that may have an environmental impact will be dealt with in individual SEPA documents.

*Response:*

- Comment noted.

Local Government comments:

**Letter from the City of Auburn to Elizabeth Phinney, WSDOT dated August 6, 2010**

Topic: Future alternative station stops along the Pacific Northwest Rail Corridor

*Future Alternative Station Stops Comments:*

- The City of Auburn reminded WSDOT of its commitment to include language in the Environmental Assessment (EA) addressing how alternative station stops will be considered in the future. The potential station stops are not connected to the proposed program but are related to the WSDOT's long-term planning efforts. In October 2009, WSDOT and the cities of Auburn, Covington, Maple Valley, and Black Diamond agreed to specific language to be included in the EA. That language was as follows: "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 Puget Sound Regional Council, 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." A modified version of this text was incorporated into the EA as Errata as described in Section IIV above.

*Response:*

- Section VII of this FONSI, under Errata to the Environmental Assessment (see Page 1-4, after Paragraph 2) addresses the concerns regarding future alternative station stops expressed by the City of Auburn.

**Letter from the City of Renton to Elizabeth Phinney, WSDOT dated August 6, 2010**

Topic: Tukwila Station

*Tukwila Station Comments:*

- The City of Renton stated that Sound Transit commuter rail studies have indicated that a significant percentage of passengers at the Station will originate from the east side of the City, and requested that proposed improvements at the Station be coordinated with Sound Transit to include public access from the east for both Amtrak and Sound Transit passengers.

*Response:*

- When funding is available to make improvements to Tukwila Station, WSDOT will work with Sound Transit to evaluate how improved access from the east could be accomplished for both intercity and commuter rail passengers.

**E-mail from the City of DuPont to Elizabeth Phinney, WSDOT dated August 11, 2010**

Topic: Noise Section in Environmental Commitments

*Environmental Commitments, Noise Section Comments:*

- The City of DuPont noted that more specificity is needed in Section L, Noise environmental commitments from the Draft FONSI. The City recommended revising this section to state that WSDOT will conduct a noise assessment if buildings are located within the screening distances indicated on Table 4-1 of Publication FTA-VA-90-1003-06 and propose appropriate and effective mitigation where warranted.

*Response:*

- As described in Section L of this document, noise and vibration impacts will be further investigated during site specific environmental reviews. The method of analysis for the investigations will follow the Federal Transit Administration's "Transit Noise and Vibration Impact Assessment Guidance Manual, 2<sup>nd</sup> Edition, May 2006" and if applicable, the Federal Railroad Administration's "Guidance Manual for High-Speed Ground Transportation Noise and Vibration Impact Assessment, October 2005."

**IX. Ongoing Project-level Activities that are Part of the Washington State Segment of the PNWRC, Corridor Service Expansion Program**

Two projects that are part of the Washington State segment of the PNWRC, Corridor Service Expansion Program have completed project-level environmental clearance with FRA in advance of the issuance of the final FONSI. They include:

- Advanced Signal System – Clark, Cowlitz, Lewis, Thurston, Pierce, King, Snohomish, Skagit, and Whatcom counties (Service Block 2)  
Prepare for a new train control system between locomotives, trackside signals, and road/rail crossings by converting relay interlockings to solid state interlockings at various locations on the main line between the Columbia River at the southern border of Clark County and Canada at the northern border of Whatcom County.
- Cascades Corridor Reliability Upgrades – South – Clark, Cowlitz, Lewis, Thurston and Pierce counties (Service Block 1)  
Track quality improvements will be made at various locations on the main line between Nisqually Junction in Pierce County and the Columbia River at the southern border of Clark County.

These two projects are categorically excluded from the requirements of FRA's Procedures for Considering Environmental Impacts (64 FR 28545, May 26, 1999) as they do not individually or cumulatively have a significant effect on the human or natural environment. The implementation of these projects on the Washington State Segment of the PNWRC both have independent utility and neither project limits the choice of reasonable program alternatives (see 49 CFR §1506.1). Both the track quality improvements and signal system improvements would be implemented independent of the proposed program, as they are

necessary for continuing maintenance and upgrades for existing service and do not change the nature or capacity of the existing infrastructure.

## **X. Conclusion**

At the Tier-1 level of review, the FRA finds that the Corridor Service Expansion program, which includes Service Blocks 1, 2, and 3, as assessed in the 2009 Tier-1 EA, satisfies the requirements of FRA's "Procedures for Considering Environmental Impacts" and will not have a significant impact on the quality of the human or natural environment, following the implementation of the mitigation measures identified in this document and those which will be developed during the site-specific environmental documentation process for specific improvements.

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# Table 1

## Summary of Potential Impacts



Project	Table 1. Summary of Potential Impacts											
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
<b><i>Service Block 1</i></b>												
<b>Tacoma – D to M Street Connection</b>	No impacts to any waterways or hydrologic systems are anticipated and the project is not located within a 100-year floodplain or floodway.	4 sites known or have the potential for contamination; 5 sites with LUST <sup>1</sup> ; 1 site with UST <sup>2</sup> within the project area. Additional 5 sites of concern <sup>3</sup> . Existing contaminated soil or ground water could potentially be encountered during construction. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.	No significant impacts on biological resources are expected. Four low quality wetlands would be permanently filled, and will be replaced at a one-to-one ratio.	The project occurs in an USEPA-designated maintenance area <sup>4</sup> for carbon monoxide and ozone. Adverse air quality impacts are not expected based on expected levels of delay at area intersections. Fugitive dust emissions will be controlled during construction.	The project area contains steep slopes. During construction, standard erosion and sedimentation control BMPs will be required.	Ten businesses and four residential units will be displaced and two additional properties will be affected. These changes will not result in significant impacts to the general character or land uses of the project area. Property acquisition will be conducted in conformance with federal requirements.	No farmland conversion will occur.	No impacts to the Pacific Brewing and Malting Company Historic District or to other historic or potentially eligible properties. The State Historic Preservation Officer has concurred with these findings in a letter dated November 20, 2001.	Short-term economic benefit will be provided to the area during project construction. Construction may cause short-term temporary changes in access and traffic circulation. Any displaced residents or businesses would receive relocation assistance per federal requirements. The project will not cause any disproportionately high and adverse impacts to populations protected by Executive Order 12898 on Environmental Justice. In fact, the project will increase transportation alternatives for the community.	No significant adverse impacts on visual quality are anticipated. The new rail bridge over Pacific Avenue will be consistent with the immediate surroundings and will not negatively affect the overall visual character of the area.	Energy use will be lower as a result of providing rail transit for the public because many riders will choose to leave their passenger vehicles at home and ride the train. Temporary increase in energy consumption during construction is possible.	Major noise sources near the project site include Interstate 5, Interstate 705, major arterials, commercial and industrial activity, activity on existing rail routes, and occasional military aircraft. The highest level of noise resulting from this project would be generated by warning horns at grade crossings which will be used to minimize the noise impact to the community.
<b>Tacoma – Point Defiance Bypass</b>	No impacts to waterways or hydrologic	3 Substantially Contaminated Sites <sup>5</sup> and 21	No impacts.	The project area is currently	At the southern end of the project, there is an area	Less than 1 acre of property will	No farmland conversion will occur.	37 historic buildings or structures including 1 NRHP property and	Traffic delays are expected to increase at some of the at-grade	There will be negligible changes in visual quality for nearby residents and	Energy use would be lower because less	Primary existing noise sources are traffic from I-5,

<sup>1</sup> Leaking Underground Storage Tank (LUST) is an underground storage tank that is leaking its contents into the surrounding environment, including soil and ground water, and has been documented to have leaked.

<sup>2</sup> Underground Storage Tank (UST) is a tank and any underground piping connected to the tank that has at least 10 percent of its combined volume underground.

<sup>3</sup> Sites of concern include those with operating underground storage tanks, generators of Resource Conservation Recovery Act (RCRA) hazardous waste, historic sites, and sites identified during reconnaissance activities.

<sup>4</sup> Maintenance Area is a geographical area of the state that was designated as a nonattainment area, and then redesignated as an attainment area by EPA after taking specified actions within a certain time frame to reduce emissions and attain the national Ambient Air Quality Standards (NAAQS).

<sup>5</sup> Substantially Contaminated Sites are sites that have potential for substantial contamination of soil, groundwater, surface water, and/or sediment; contain contaminants that are persistent or expensive to manage; and lack information on predicted remedial costs.



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	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
	systems are anticipated and the project is not located within a 100-year floodplain or floodway.	Reasonably Predictable Sites <sup>6</sup> within 500 feet of project site. However, none of these sites will be impacted by the project. Existing contaminated soil or ground water could potentially be encountered during construction. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.		designated as meeting all <i>National Air Quality Standards</i> (NAAQS). Fugitive dust emissions will be controlled during construction.	with steep slopes, which will not be impacted by the project. During construction, standard erosion and sedimentation control BMPs will be required.	be acquired, changing its land use from residential to railroad right-of-way.		3 NRHP-eligible properties, and 3 historic-period archaeological sites were identified within 150 feet of the rail line. The project will have no impacts on these structures or sites. The State Historic Preservation Officer has concurred with these findings in a letter dated March 28, 2008.	crossings and increases in noise due to additional passenger rail traffic are also expected. Community cohesion will remain intact because the proposed physical changes will not change mobility or access to neighborhoods or public services. Improvements to at-grade crossings will provide a benefit to the community by improving public safety and traffic flow. There are no disproportionately high or adverse impacts to populations protected by Executive Order 12898 on Environmental Justice.	for motorists because the project will be within the railroad right of way and will be similar in appearance to the existing tracks and supporting structures.	fuel would be used by intercity passenger trains on the bypass route, which is 6 miles shorter than the current route on the BNSF main line. Temporary increase in energy consumption during construction.	surface arterials and local streets. Because of the proximity of much of the corridor to I-5, noise levels in the corridor are fairly uniform. The highest level of noise resulting from this project would be generated by warning horns at grade crossings which will be used to minimize the noise impact to the community.
<b>Vancouver – Yard Bypass Track</b>	No impacts to waterways or wetlands are anticipated as a result of this project. No adverse impacts to the Troutdale Sole Source Aquifer, which underlies the project area will result from this project; Best Management Practices will be	Existing contaminated soil or ground water could potentially be encountered during construction. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.	No impacts.	The project occurs in an USEPA-designated maintenance area for carbon monoxide and ozone. The project ambient criteria pollutants will not exceed the NAAQS. Fugitive dust	Construction of the bypass track will require grading activities that will impact the existing topography. During construction, standard erosion and sedimentation control BMPs <sup>7</sup> will be required.	No impacts.	No farmland conversion will occur.	No impacts.	No impacts.	No impacts.	By facilitating train movement through the rail yard, less energy will be consumed by idling trains.	There will likely be a decrease in train noise as the proposed project will facilitate train movement through the rail yard and decrease idling time for locomotives.

<sup>6</sup> Reasonably Predictable Sites are sites with recognized environmental conditions based on existing data, or they can be predicted to have those conditions based on site observations, previous experience, or by using best professional judgment. These sites are typically small, contaminants are localized and are relatively nontoxic; and abatement or remediation activities are routine. Common examples might include a dry cleaning business or a former gas station.

<sup>7</sup> BMPs are Best Management Practices, which are techniques used to control stormwater runoff, sediment, and stabilize soil. These techniques could include silt fencing, hydroseeding, mulching, bank/slope stabilization, filter fabric, siltation pond, etc. Source: WSDOT Highway Runoff Manual, Chapter 6 "Temporary Erosion and Sediment Control Design Guidelines and Process, Appendix 6A "Best Management Practices".



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	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
	implemented during construction.			emissions will be controlled during construction.								
<b>Vancouver – New Middle Lead</b>	No impacts to waterways or wetlands are anticipated as a result of this project. No adverse impacts to the Troutdale Sole Source Aquifer, which underlies the project area, will result from this project; Best Management Practices will be implemented during construction.	Existing contaminated soil or ground water could potentially be encountered during construction. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.	No impacts.	The project occurs in an USEPA-designated maintenance area for carbon monoxide and ozone. The project ambient criteria pollutants will not exceed the NAAQS. Fugitive dust emissions will be controlled during construction.	No impacts.	No impacts.	No farmland conversion will occur.	No impacts.	No impacts.	No impacts.	By facilitating train movement through the rail yard, less energy will be consumed by idling trains.	There will likely be a decrease in train noise as the proposed project will facilitate train movement through the rail yard and decrease idling time for locomotives.
<b>Vancouver – West Side Port Associated Trackage</b>	It is anticipated that 0.17 acre of wetland will be filled and mitigation will include 0.38 acre of wetland creation. A small portion of the project area is within the 100-year floodplain of the Columbia River; however flood modeling showed a negligible impact. No adverse impacts	Parcels with hazardous material releases from existing and historic industrial facilities were identified. The proposed rail alignment would be constructed on facilities that are required to maintain caps in accordance with WA Dept of Ecology agreed orders and decrees, and would require approval from	No impacts.	The project occurs in an USEPA-designated maintenance area for carbon monoxide and ozone. The project ambient criteria pollutants will not exceed the NAAQS. Fugitive dust emissions will be controlled during construction.	No impacts.	Project site is characterized by intensive industrial uses. A small amount of industrial land will be converted into rail right-of-way. No additional property will be acquired.	No farmland conversion will occur.	No impacts.	No impacts.	The new loop track will not impact the visual quality of the area as it is located on Port property. The highway-rail grade separation will be visible from the surrounding neighborhoods and businesses; however the visual effect of the grade separation would be consistent with the existing highly industrialized landscape.	Overall, less energy will be used because there will be less congestion on the BNSF north-south main line as freight trains move more smoothly onto the Port property.	There will likely be a decrease in train noise as the proposed project will facilitate train movement onto Port property and decrease idling time for locomotives.



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	to the Troutdale Sole Source Aquifer, which underlies the project area; Best Management Practices will be implemented during construction.	Ecology prior to starting work. Existing contaminated soil or ground water could potentially be encountered during construction. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.										
<b>Cascades Corridor Reliability Upgrades -- South</b>	Temporary water quality impacts during construction over and adjacent to waterways will be avoided through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington, and using BMPs, as appropriate. No other impacts are likely.	There are no known hazardous materials sites that would be affected by the corridor reliability upgrades.	No impacts.	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	No impacts.	No impacts.	No farmland conversion will occur.	No impacts.	Minor impacts to rail operations and vehicle traffic will occur during construction of the reliability upgrades. Amtrak and BNSF railway are aware of the impacts. BNSF will coordinate with local roadway jurisdictions as needed.	No impacts.	A temporary increase in energy consumption would occur during construction. Long-term energy use will be lower as a result of increasing the reliability of the rail corridor. There will be less locomotive idling when congested areas are eliminated. Also, ridership should increase when passengers are better able to depend on the timeliness of train schedules;	Noise levels are already high due to existing freight operations. During construction, people working and living near improvements may be exposed to additional noise and vibration originating from construction equipment.



Project	Table 1. Summary of Potential Impacts											
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
												thus, cars will be removed from the road.
<b>Cascades Corridor Reliability Upgrades -- North</b>	Temporary water quality impacts during construction over and adjacent to waterways will be avoided through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington and using BMPs, as appropriate. No other impacts are likely.	There are no known hazardous materials sites that would be affected by the corridor reliability upgrades.	No impacts.	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	No Impacts.	No impacts.	No farmland conversion will occur.	No impacts.	Minor impacts to rail operations and vehicle traffic will occur during construction of the reliability upgrades. Amtrak and BNSF railway are aware of the impacts. BNSF will coordinate with local roadway jurisdictions as needed.	No impacts.	A temporary increase in energy consumption would occur during construction. Long-term energy use will be lower as a result of increasing the reliability of the rail corridor. There will be less locomotive idling when congested areas are eliminated. Also, ridership should increase when passengers are better able to depend on the timeliness of train schedules; thus, cars will be removed from the road.	Noise levels are already high due to existing freight operations. During construction, people working and living near improvements may be exposed to additional noise and vibration originating from construction equipment.
<b>King Street Station – Seismic Retrofit</b>	N/A	Lead and asbestos abatement was previously completed. There are no other hazardous materials expected to be encountered during the seismic retrofit.	N/A	N/A	N/A	No impacts.	N/A	King Street Station is on the National Register of Historic Places. A seismic retrofit will be conducted to ensure the historic integrity of the structure.	Long-term viability of King Street Station will ensure the continued availability of intercity passenger rail service.	King Street Station will continue to be a visual "fixture" in the downtown community with the proposed structural improvements.	N/A	N/A



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<b>Blaine – Swift Customs Facility Siding</b>	Temporary water quality impacts during construction will be avoided or minimized through compliance with the Washington Department of Ecology’s Stormwater Management Manual for Western Washington, and using BMPs, as appropriate. If wetland fill is required, appropriate mitigation will be completed as part of the pre-construction permitting process.	Existing contaminated soil or ground water could potentially be encountered during construction. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations	No impacts.	Temporary impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. These impacts are expected to be intermittent, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	There is the potential for erosion resulting from exposure of excavated soils to water during construction. Standard erosion and sedimentation control BMPs will be required.	No impacts.	No farmland conversion will occur.	No impacts.	There will be increased reliability for intercity passenger train movement through this area, which will benefit the traveling public.	No impacts.	By allowing passenger trains to move more smoothly through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	There will be less locomotive idling because passenger trains will not be blocked by freight trains undergoing customs inspection. During construction, people working and living near the improvements may be exposed to noise originating from construction equipment.
<b>Everett – Storage Track</b>	No waterways or hydrological systems on the project site. Construction will comply with the WA Dept of Ecology’s Stormwater Management Manual for Western Washington and city grading/drainage ordinances and BMPs, as	Recent civil construction removed all contaminated soil from project site. There are no other hazardous materials expected to be encountered during construction of the proposed project.	No impacts.	Temporary impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. These impacts are expected to be intermittent, and they will be diluted at	Tracks will be laid on existing subgrade material. No excavation is necessary.	No impacts.	No farmland conversion will occur.	No impacts.	No impacts.	No impacts.	By allowing passenger trains to move more smoothly through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	Noise level already high due to existing freight operations. During construction, people working and living near the improvements may be exposed to additional noise originating from construction equipment.



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	appropriate.			increasing distances from the project. Fugitive dust emissions will be controlled during construction.								
<b>Amtrak Cascades – New Train Set</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b><u>Service Block 2</u></b>												
<b>Amtrak Cascades – New Train Sets</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Amtrak Cascades – High Speed Locomotives</b>	N/A	N/A	N/A	The new locomotives will benefit air quality by having fewer emissions.	N/A	N/A	N/A	N/A	N/A	N/A	The new locomotives will be more efficient and will use less energy.	New high-speed locomotives could potentially produce less noise than current locomotives.
<b>Advanced Signal System</b>	No impacts.	There are no known hazardous materials sites that would be affected by the advanced signal system implementation.	No impacts.	Temporary impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts are expected to be intermittent, and they will be diluted at increasing	No impacts.	No impacts.	No impacts.	No impacts.	No impacts.	No impacts.	During construction, a temporary increase in energy consumption would occur.	A temporary increase in noise could occur from construction equipment used to install the advanced signal system.



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				distances from the project. Fugitive dust emissions will be controlled during construction.								
<b>Kelso to Martins Bluff – New Siding</b>	No impacts to waterways or hydrological systems. Construction will comply with the Washington Department of Ecology’s Stormwater Management Manual for Western Washington and BMPs, as appropriate.	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations	No impacts.	Temporary impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts are expected to be intermittent, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.	No impacts.	No farmland conversion will occur.	No impacts.	The project is located in an industrial area, and there are no grade crossings affected by the project. Project construction will not impact traffic on the adjacent road. No homes or businesses will be relocated; community cohesion will not be affected. Corridor service expansion would not result in any disproportionately high or adverse impacts to populations protected by Executive Order 12898 on Environmental Justice.	No impacts.	By allowing passenger trains to move more smoothly through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	Noise level already high due to existing freight operations. During construction, people working and living near the improvements may be exposed to additional noise originating from construction equipment.
<b>Kelso to Martins Bluff – Toteff Siding Extension</b>	The culvert on Schoolhouse Creek will be extended to accommodate the siding extension. Temporary water quality impacts during construction will be avoided or	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would	Some impacts to fisheries, vegetation, and wildlife could be expected. In these areas, critical, suitable or available habitat for species could be lost or modified in ways that limit usability by species. A small	Temporary impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in	If some farmland is converted for wetland mitigation, then there will be a change in land use. However, no other land use impacts are	Some farmland could be converted to a mitigation site for wetland impacts. The amount and location of the farmland converted to wetland mitigation will	Based on review of GIS data, the proposed project is unlikely to have impacts to parks and cultural resources. A cultural resources survey will be completed, and Section 106 consultation will occur during the	The project is located in an industrial area. The roadway bridge will enable vehicles, including cargo trucks, to move directly from Interstate 5 to surface roads and the Port of Kalama. The existing at-grade crossing will be closed. However, any properties whose access is affected by the	One roadway bridge will be added and will be constructed on concrete columns or steel pilings. New concrete retaining walls above or below the railroad or associated highway improvements would be added. The roadway bridge may be visible from properties located in close	By allowing passenger trains to move more smoothly through the area, less energy will be used. During construction, a temporary increase in energy	Noise level already high due to existing freight operations. During construction, people working and living near the improvements may be exposed to additional



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	<p>minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington and BMPs, as appropriate. Improvements will require placing fill in floodplains (including wetlands and non-wetlands). Improvements will be designed to meet standard engineering practices to avoid and minimize impacts to floodplains and hydrological connection of waterways.</p>	<p>be conducted as appropriate in accordance with applicable laws and regulations</p>	<p>amount of fill will be placed in the floodplain (including wetlands and non-wetlands). The project could also affect less than one river mile of fish-designated critical habitat within Schoolhouse Creek. Mitigation measures would follow a hierarchy of avoidance, minimization, and compensation for impacts. Sensitive areas will be avoided as much as possible. Engineering designs will be developed to minimize impacts to aquatic resources. Restoring degraded wetlands, enhancing existing wetlands, creating new wetland habitat, or purchasing wetland mitigation bank credits can be used to replace impacted wetlands. Enhancing existing wetlands within the immediate project area may involve eradicating invasive plant species and planting native vegetation.</p>	<p>impacts are expected to be intermittent, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.</p>	<p>wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.</p>	<p>expected.</p>	<p>vary depending on consultation with the permitting agencies.</p>	<p>development of the site-specific environmental documentation.</p>	<p>crossing closure would have their access restored or maintained. No homes or businesses will be relocated; community cohesion will not be affected. Corridor service expansion would not result in any disproportionately high or adverse impacts to populations protected by Executive Order 12898 on Environmental Justice.</p>	<p>proximity; however the visual effect of the grade separation would be consistent with the existing highly industrialized landscape.</p>	<p>consumption would occur.</p>	<p>noise originating from construction equipment.</p>



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<b>Kelso to Martins Bluff – Kelso to Longview Junction</b>	1 or 2 new rail bridges will be constructed over the Coweeman River. Temporary water quality impacts during construction will be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington and BMPs, as appropriate. Improvements will require placing fill in floodplains (including wetlands and non-wetlands). Physical improvements will be designed to meet standard engineering practices to avoid and minimize impacts to floodplains and hydrological connection of waterways.	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.	Some impacts to fisheries, vegetation, and wildlife could be expected. In these areas, critical, suitable or available habitat for species could be lost or modified in ways that limit usability by species. A small amount of fill will be placed in the floodplain (including wetlands and non-wetlands). Mitigation measures would follow a hierarchy of avoidance, minimization, and compensation for impacts. Sensitive areas will be avoided as much as possible. Engineering designs will be developed to minimize impacts to aquatic resources. Restoring degraded wetlands, enhancing existing wetlands, creating new wetland habitat, or purchasing wetland mitigation bank credits can be used to replace impacted wetlands. Enhancing existing wetlands within the	Temporary impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts are expected to be intermittent, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.	Based on preliminary analysis, there will be a change in land use for less than 8 acres of land needed for related roadway improvements. It is possible this land would be farmland converted into a wetland mitigation site. No other land use impacts are expected.	If a wetland mitigation bank is not available, some farmland may be converted to a mitigation site for wetland impacts. The amount and location of the farmland converted to wetland mitigation will vary depending on consultation with the permitting agencies.	Based on review of GIS data, the proposed project is unlikely to have impacts to parks and cultural resources. A cultural resources survey will be completed, and Section 106 consultation will occur during the development of the site-specific environmental documentation.	Rail and road vehicle traffic separation with the construction of the new Hazel Street roadway overpass over the corridor main line, and the elimination of the two at-grade crossings at Mill and Yew streets will eliminate the possibility for train/vehicle collision. Community cohesion could be affected due to the potential relocation of 4 to 5 homes and 1 business for construction of the overpass. However, corridor service expansion would not result in any disproportionately high and adverse impacts to populations protected by Executive Order 12898 on Environmental Justice, and displaced residents or businesses would receive relocation assistance per federal requirements.	The new roadway overpass over the corridor main line at Hazel Street, which was selected by the community, includes concrete retaining walls and associated street improvements, and would be visible from properties in proximity to the new structure. The visual effect of the new overpass would be consistent with the existing industrialized/airport landscape. In addition, the project includes 1 or 2 new rail bridges constructed on concrete columns or steel pilings alongside the existing bridges over the Coweeman River. These bridges will present a minor visual impact.	By allowing passenger trains to move more smoothly through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	Noise level already high due to existing freight operations. During construction, people working and living near improvements may be exposed to additional noise originating from construction equipment.



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			immediate project area may involve eradicating invasive plant species and planting native vegetation.									
<b><i>Service Block 3</i></b>												
<b>King Street Station Track Upgrades</b>	No impacts.	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.	No impacts.	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.	No impacts.	No farmland conversion will occur.	No impacts.	No impacts.	No impacts.	By facilitating passenger train movement through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	Temporary noise impacts would occur during construction of this project.
<b>Kelso to Martins Bluff – Kalama New Main Line</b>	Temporary water quality impacts during construction adjacent to wetlands and waterways will	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and	Some impacts to fisheries, vegetation, and wildlife could be expected. In these areas, critical, suitable or available	Temporary impacts during construction are expected to be an increase in dust, odors,	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs	If a wetland mitigation bank is not available, and some farmland is converted for wetland	If a wetland mitigation bank is not available, some farmland may be converted to a mitigation site	Based on review of GIS data, the proposed project is unlikely to have impacts to parks and cultural resources. A cultural resources	Community cohesion will benefit from the construction of an ADA-accessible pedestrian overpass over the corridor main line, which will enable increased	The new pedestrian overpass replaces an existing non-ADA-compliant overpass in a waterfront industrial area.	The Kalama new main line will be used primarily by passenger trains. By facilitating passenger train	Noise level is already high due to the existing freight operations. During construction,



Project	Table 1. Summary of Potential Impacts											
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
	be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington and BMPs, as appropriate. Improvements will require placing a small amount of fill in floodplains (including wetlands and non-wetlands). Physical improvements will be designed to meet standard engineering practices to avoid and minimize impacts to floodplains and hydrological connection of waterways.	commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.	habitat for species could be lost or modified in ways that limit usability by species. A small amount of fill will be placed in floodplains (including wetlands and non-wetlands). Mitigation measures would follow a hierarchy of avoidance, minimization, and compensation for impacts. Sensitive areas will be avoided as much as possible. Engineering designs are developed to minimize impacts to aquatic resources. Restoring degraded wetlands, enhancing existing wetlands, creating new wetland habitat, or purchasing wetland mitigation bank credits can be used to replace impacted wetlands. Enhancing existing wetlands within the immediate project area may involve eradicating invasive plant species and planting native vegetation.	other particulate matter, and hydrocarbons. Construction impacts are expected to be intermittent, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.	mitigation, then there will be a change in land use. However, no other land use impacts are expected.	for wetland impacts. The amount and location of the farmland converted to wetland mitigation will vary depending on consultation with the permitting agencies.	survey will be completed, and Section 106 consultation will occur during the development of the site-specific environmental documentation.	access to a park and marina. No homes or businesses will be relocated. There are no at-grade crossings on the project site. Corridor service expansion would not likely involve any disproportionately high and adverse impacts to populations protected by the Environmental Justice Executive Order.		movement through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	people working and living near the improvements may be exposed to additional noise originating from construction equipment.



Project	Table 1. Summary of Potential Impacts											
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
<b>Bellingham Main Line Relocation</b>	Temporary water quality impacts during construction over and adjacent to waterways will be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington and BMPs, as appropriate.	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations	Some impacts to vegetation could be expected. In these areas, critical, suitable or available habitat for species could be lost or modified in ways that limit usability by species. Mitigation measures would follow a hierarchy of avoidance, minimization, and compensation for impacts. Sensitive areas will be avoided as much as possible.	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.	No impacts.	No farmland conversion will occur.	No impacts to parks or known cultural resources are anticipated as a result of this project. A cultural resources survey will be completed, and Section 106 consultation will occur during the development of the site-specific environmental documentation.	Unlikely to require the relocation of any homes or businesses. Unlikely to cause any disproportionately high and adverse impacts on populations protected by the Environmental Justice Executive Order.	The existing roadway bridge will be replaced with a new bridge that will be constructed on concrete columns or steel pilings. New concrete retaining walls above or below the railroad or associated highway improvements would be added. The bridge replacement would be consistent with the visual quality of the area.	By facilitating passenger train movement through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	Noise level already high due to existing freight operations. During construction, people working and living near improvements may be exposed to additional noise and vibration originating from construction equipment.
<b>Everett Curve Realignment</b>	Temporary water quality impacts during construction adjacent to waterways will be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws	Some impacts to fisheries, vegetation, and wildlife could be expected. In these areas, critical, suitable or available habitat for species could be lost or modified in ways that limit usability by species. The project could place a small amount of fill in the floodplain (including wetlands and non-wetlands).	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking	No impacts.	No farmland conversion will occur.	The proposed project is unlikely to impact parks or cultural resources. A cultural resources survey will be completed, and Section 106 consultation will occur during the development of the site-specific environmental documentation.	No relocation of any homes or businesses. Unlikely to cause any disproportionately high and adverse impacts on populations protected by the Environmental Justice Executive Order.	No impacts.	By facilitating passenger train movement through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	Noise level already high due to existing freight operations. During construction, people working and living near improvements may be exposed to additional noise and vibration originating from construction equipment.



Project	Table 1. Summary of Potential Impacts												
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise	
	Washington and BMPs, as appropriate. Improvements will be constructed directly adjacent to the Snohomish River. Improvements will require placing a small amount of fill in floodplains (including wetlands and non-wetlands). Physical improvements will be designed to meet standard engineering practices to avoid and minimize impacts to floodplains and hydrological connection of waterways.	and regulations	Mitigation measures would follow a hierarchy of avoidance, minimization, and compensation for impacts. Sensitive areas will be avoided as much as possible. Engineering designs are developed to minimize impacts to aquatic resources. Restoring degraded wetlands, enhancing existing wetlands, creating new wetland habitat, or purchasing wetland mitigation bank credits can be used to replace impacted wetlands. Enhancing existing wetlands within the immediate project area may involve eradicating invasive plant species and planting native vegetation.	only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	soil onto nearby paved roads by construction vehicles.								
<b>Centralia – Station Modifications</b>	No impacts to waterways and hydrological systems. Temporary water quality impacts during construction will be avoided or minimized through	Existing contaminated soil or ground water could potentially be encountered during construction. If encountered, removal or treatment would be conducted as	No impacts.	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction	No impacts.	No impacts.	No farmland conversion will occur.	The Centralia Station is eligible for the National Register of Historic Places. The proposed pedestrian overcrossing will be conducted to avoid affecting the historic eligibility of the Station.	This project will not involve any disproportionately high and adverse impacts on populations protected by the Environmental Justice Executive Order. The project will benefit the entire community by improving the pedestrian accessibility to the	A new pedestrian overcrossing will be added adjacent to the Station, and will be consistent with the historic nature of the Station and the surrounding community.	During construction, a temporary increase in energy consumption would occur.	Temporary noise impacts during construction.	



Project	Table 1. Summary of Potential Impacts											
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
	compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington, and city grading/drainage ordinances and BMPs, as appropriate.	appropriate in accordance with applicable laws and regulations.		impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.					Station.			
<b>King Street Station Renovation</b>	N/A	Lead and asbestos abatement was previously completed. There are no other hazardous materials expected to be encountered during the station renovation.	N/A	No impacts to air quality anticipated as the Station renovation will occur in the interior of the Station.	N/A	No impacts.	N/A	King Street Station is on the National Register of Historic Places. Renovations to the station would be conducted in accordance with the Department of Interior's Standards for Rehabilitation <sup>8</sup> to maintain the historic integrity of the Station.	Long-term viability of King Street Station will ensure the continued availability of intercity passenger rail service.	King Street Station will continue to be a visual "fixture" in the downtown community with the proposed renovations.	Energy consumption would decrease when the Station's heating and cooling systems are updated.	N/A
<b>Tukwila Station</b>	Temporary water quality impacts during construction will be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would	No impacts.	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in	No impacts.	No farmland conversion will occur.	No impacts.	This project will not involve any disproportionately high and adverse impacts on populations protected by the Environmental Justice Executive Order. The project will benefit the traveling public by providing shelter from the weather while waiting for trains, and by providing	No impact.	During construction, a temporary increase in energy consumption would occur.	Temporary noise impacts would occur during construction of this project.

<sup>8</sup> 36 CFR 67



Project	Table 1. Summary of Potential Impacts											
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
	Management Manual for Western Washington, and city grading/drainage ordinances and BMPs, as appropriate.	be conducted as appropriate in accordance with applicable laws and regulations.		project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.				updated passenger information.			
<b>Vancouver Port Access</b>	Temporary water quality impacts during construction over and adjacent to waterways will be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington, and city grading/drainage ordinances and BMPs, as appropriate.	There is a risk of encountering contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.	No impacts.	Impacts during construction are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	There is the potential for erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.	No impacts.	No farmland conversion will occur.	No impacts to parks or known cultural resources are anticipated as a result of this project. A cultural resources survey will be completed, and Section 106 consultation will occur during the development of the site-specific environmental documentation.	No impact to homes; unlikely to impact businesses. Project would not likely involve any disproportionately high and adverse impacts on populations protected by the Environmental Justice Executive Order.	No impacts.	By facilitating passenger train movement through the area, less energy will be used. During construction, a temporary increase in energy consumption would occur.	Noise level already high due to existing freight operations. During construction, people working and living near improvements may be exposed to additional noise and vibration originating from construction equipment.
<b>Tacoma Trestle Replacement</b>	Temporary water quality	There is a risk of encountering	No impacts.	Impacts during construction	There is the potential for	No impacts.	No farmland conversion will	No impacts to parks or known cultural	No relocation of homes or businesses. The project	No impacts to visual quality for the trestle	During construction, a	During construction,



Project	Table 1. Summary of Potential Impacts											
	Waterways and Hydrological Systems	Hazardous Materials	Biological Resources/ Ecology	Air Quality	Soils and Geology	Land Use	Farmlands	Parks and Cultural Resources	Social and Economic	Visual Quality	Energy	Noise
	impacts during construction will be avoided or minimized through compliance with the Washington Department of Ecology's Stormwater Management Manual for Western Washington, and city and county grading/drainage ordinances and BMPs, as appropriate.	contaminated soil and ground water in this area as there is a history of industrial and commercial land use in the vicinity. If encountered, removal or treatment would be conducted as appropriate in accordance with applicable laws and regulations.		are expected to be an increase in dust, odors, other particulate matter, and hydrocarbons. Construction impacts in the project area are expected to be temporary and intermittent only, and they will be diluted at increasing distances from the project. Fugitive dust emissions will be controlled during construction.	erosion resulting from exposure of excavated soils to water during construction. BMPs will be employed during construction to prevent deposition of silt and/or sediment in wetlands, streams, or any other adjacent surface water, to limit dust, and avoid tracking soil onto nearby paved roads by construction vehicles.		occur.	resources are anticipated as a result of the proposed project. A cultural resources survey will be completed, and Section 106 consultation will occur during the development of the site-specific environmental documentation.	will not involve any disproportionately high and adverse impacts on populations protected by the Environmental Justice Executive Order.	replacement because it will be similar in appearance and structure to the existing trestle. New concrete retaining walls above and below the railroad and associated highway improvements would be new visual elements, although they are consistent with the surrounding industrial landscape.	temporary increase in energy consumption would occur.	people working near the improvements may be exposed to noise and vibration originating from construction equipment.



# 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

Mailing address: PO Box 48343 • Olympia, Washington 98504-8343

(360) 586-3065 • Fax Number (360) 586-3067 • Website: [www.dahp.wa.gov](http://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](http://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](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](mailto: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](mailto:somers.elaine@epa.gov).

Sincerely,

/s/

Teresa Kubo, Acting Manager  
Environmental Review and Sediment  
Management Unit



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  
www.wsdot.wa.gov

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,

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 printed 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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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  
www.wsdot.wa.gov

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  
Page 2

*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](mailto: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 2<sup>nd</sup> 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

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\* 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.

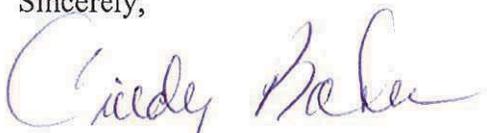
- C. **Air Quality.** Future project-level consideration of air quality impacts should include an analysis of travel modes and trip distribution associated with passenger access to and from the intercity rail stations, including an evaluation of the proposed location of those stations in relationship 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.

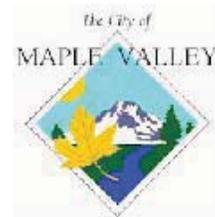
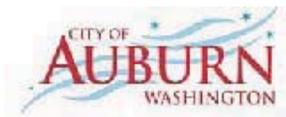
WSDOT acknowledges that specific information sources used in the EA were not always clear; using the errata section in the FONSI, those references have now been updated.

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 2<sup>nd</sup> 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.




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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

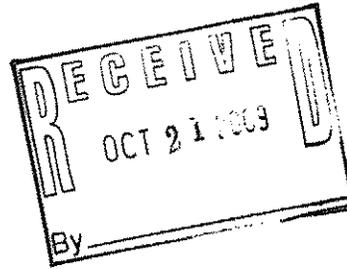


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CLARK COUNTY  
WASHINGTON

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](mailto:jefferk@wsdot.wa.gov). I can be contacted at 360-705-7902 or at [phinnee@wsdot.wa.gov](mailto: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](http://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](mailto: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](mailto: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.

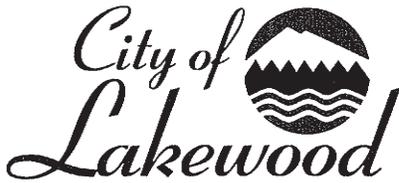
Please don't hesitate to contact me if you have any questions. I can be reached at 360-705-7902 or at [phinnee@wsdot.wa.gov](mailto:phinnee@wsdot.wa.gov).

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, 108<sup>th</sup> Street, 100<sup>th</sup> 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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Washington State  
Department of Transportation  
Paula J. Hammond, P.E.  
Secretary of Transportation

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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 9<sup>th</sup>.

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](mailto: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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Washington State  
Department of Transportation  
Paula J. Hammond, P.E.  
Secretary of Transportation

Transportation Building  
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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](mailto:jefferk@wsdot.wa.gov). For environmental questions, please contact me at 360-705-7902 or at [phinnee@wsdot.wa.gov](mailto: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, 5<sup>th</sup> 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



Washington State  
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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](mailto: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



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Department of Transportation  
Paula J. Hammond, P.E.  
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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](mailto: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](mailto:phinnee@wsdot.wa.gov).

Sincerely,

Elizabeth Phinney  
Rail Environmental Engineer  
State Rail and Marine Office

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# Appendix B

## Comment Letters and Responses on the Draft FONSI





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

August 11, 2010

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) Tier 1  
EPA Project Number: 09-063-FRA

Dear Ms. Phinney:

The U.S. Environmental Protection Agency has reviewed the Pacific Northwest Rail Corridor (PNRC) 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.

This EA is the Tier 1 level analysis for the broader PNRC project. Subsequent NEPA analyses will be prepared as project specific proposals are developed. We commend Federal Railroad Administration (FRA) and Washington State Department of Transportation (WSDOT) for their efforts on this document; we note that it is well organized which facilitates review. EPA's comments on the previous (2009) PNRC program EA expressed concerns related to wildlife crossings and the need to mitigate those potential impacts. We appreciate your response to our letter on the previous EA (in Appendix A), the recent staff time given to talk with us about the project, and the opportunity to review this revised EA.

We support the purpose and need for the project, which is to increase ridership between the Columbia River and Canadian Border in Washington State and reduce congestion on the I-5 corridor through infrastructure improvements in the PNRC. We acknowledge that increasing rail times and infrastructure can ultimately strengthen a rail transportation system that can reduce pressures from projected population increases and reduce emissions and fuel consumption as discussed in the EA. Below are our comments regarding wetlands/water quality, wildlife, planning and development, and modeling.

#### Water Resources

The EA states that there could be temporary impacts to water quality during construction in portions of the corridor and that improvements may require placement of fill in floodplains and wetlands. Additional improvements include new rail crossings over streams (e.g., Coweeman River and Schoolhouse Creek) and construction activities directly adjacent to streams (e.g., Columbia River, Cowlitz River, and Kalama River). We support the additional

improvements needed to enhance service and the utilization of the existing corridor to reduce upland impacts.

The EA does not discuss specific water quality conditions or potential site specific impacts. Therefore, we recommend that the final decision and future project proposals consider current water quality, including any impaired streams listed under Clean Water Act (CWA) Section 303 (d), any Total Maximum Daily Load (TMDL) analyses completed, underway, or planned where applicable, and how antidegradation requirements would be met for those streams that are meeting state water quality standards or are considered high quality waters. The EA appropriately discusses coordination with Washington Department of Ecology (Ecology) for storm water management and the Corps of Engineers for CWA Section 404 permits. Projects will need to comply with CWA Section 404(b)(1) Guidelines (i.e. the project must avoid wetlands, minimize impacts to wetlands and/or compensate for loss of wetlands through replacement of wetlands with equal function and value). Please note that if any of the project areas are sited on Tribal land, EPA is the authorizing agency for discharges to waters of the U.S. from storm water under the National Pollutant Discharge Elimination System (NPDES) permit and CWA Section 401 water quality certification. In such cases, please coordinate with the EPA for CWA-related permits and approvals.

### Biological Resources

The EA states that there could be loss of habitat including impacts to critical habitat for aquatic species. The EA did not include species level information or analyses. While we appreciate the inclusion of mitigation listed under Section VI, "Environmental Commitments" (EC), many of these measures are general and do not include specific requirements. We recommend that the final EA and future proposals include commitments to reduce impacts to habitat and aquatic species. These could include things such as:

- Requiring that bridge crossings over streams fully span the width of their respective floodplains to reduce impacts.
- Limiting construction activities to times of year that will avoid impacts to salmon populations.
- Developing a flood plan and utilizing BMPs to reduce additional loss of stream bank from construction activities.
- Identifying and implementing ways to maintain or improve water quality for streams in the project area.

We also recommend that project level proposals include coordination with Washington Department of Fish and Wildlife, NOAA and NMFS and incorporate any terms and conditions that may result from consultation.

Our comment letter on the previous EA included recommendations regarding wildlife. At that time we had concerns with the lack of mitigation presented for train/wildlife collisions. We appreciate the response to our letter and statement assuring us that coordination with federal and state wildlife agencies will occur at the project level and the inclusion of EC 21, which identifies activities to minimize impacts to railway/wildlife impacts. We recommend that our previous comments and recommendations be considered and incorporated into that process.

### Hazardous Materials

A survey completed during the analysis found seven superfund sites, 401 state clean up sites, and 781 leaking underground storage tank sites within 2000 feet of the rail corridor (pg 10). The EA acknowledges the importance of handling soil properly to avoid impacts to groundwater and surface water and lists specific mitigation measures to avoid or minimize impacts. We recommend that WSDOT and FRA coordinate with the appropriate lead agency early in the planning process regarding contaminated sites and clean up actions. Future proposals should include a delineation of the extent of contamination, the agency managing the site, and the status of remedial action or site assessment. Under CERCLA, EPA may be the lead agency for sites along the corridor. We recommend coordinating with the lead agency to ensure that project activities do not adversely affect clean up activities.

### Sustainable Communities

The EA discusses projected population increases and states that there will be almost a 50 percent increase in the major intercity transportation corridors in Washington State by 2013. We believe the analysis should also consider how increased rail service may induce further growth and affect regional planning efforts. We recognize that efficient and reliable rail service is likely to help reduce potential greenhouse gas emissions related to growth. We also believe it would be beneficial to consider and integrate multi-modal access to rail stations in order to potentially further reduce emissions (e.g. multi-modal transport to Seattle's King Street Station).

The final EA and future proposals should also be consistent with the U.S. Department of Housing and Urban Development (HUD), U. S. Department of Transportation (DOT), and EPA's Interagency Partnership for Sustainable Communities (Partnership)<sup>1</sup>. On June 16, 2009, EPA joined with HUD and DOT to help improve access to affordable housing, more transportation options, and lower transportation costs while protecting the environment in communities nationwide. Through a set of guiding livability principles and a partnership agreement that will guide the agencies' efforts, this partnership will coordinate federal housing, transportation, and other infrastructure investments to protect the environment, promote equitable development, and help to address the challenges of climate change. The agencies together developed the following six (6) Livability Principles:

**1. Provide more transportation choices.**

Develop safe, reliable, and economical transportation choices to decrease household transportation costs, reduce our nation's dependence on foreign oil, improve air quality, reduce greenhouse gas emissions, and promote public health.

**2. Promote equitable, affordable housing.**

Expand location- and energy-efficient housing choices for people of all ages, incomes, races, and ethnicities to increase mobility and lower the combined cost of housing and transportation.

**3. Enhance economic competitiveness.**

Improve economic competitiveness through reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers, as well as expanded business access to markets

<sup>1</sup> <http://www.epa.gov/smartgrowth/partnership/>

**4. Support existing communities.**

Target federal funding toward existing communities—through strategies like transit oriented, mixed-use development, and land recycling—to increase community revitalization and the efficiency of public works investments and safeguard rural landscapes.

**5. Coordinate and leverage federal policies and investment.**

Align federal policies and funding to remove barriers to collaboration, leverage funding, and increase the accountability and effectiveness of all levels of government to plan for future growth, including making smart energy choices such as locally generated renewable energy

**6. Value communities and neighborhoods.**

Enhance the unique characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban.

We recommend that the final EA and future proposals discuss the Partnership and how this project would align with this effort. We also recommend that DOT coordinate with local municipalities surrounding rail stations to collaborate and explore how this project can be combined with their current and future transportation and development planning.

Modeling

The EA discusses projected population increases, which substantiates the need for the project, and air quality modeling with mention of Mobile 6 and previous studies. The EA does not provide a reference for the population increase figures stated in the EA. Because the benefits rely on the premise that there will be reduced auto trips, a net reduction in energy, and reduced emissions, we believe that the EA should provide the appropriate references that support the document. Also, it would be helpful to include percent reduction in addition to number of reduced auto trips and gallons of fuel so that the predicted reduction could be better understood when comparing to baseline. For example, the table on page 13 could include: % reduction of auto trips in years 2018, 2022, and 2027. We recommend that the final EA and future proposals include references to modeling results and literature used for the effects determination.

Thank you for the opportunity to review and comment on the PNRC Program. We look forward to reviewing the project specific proposals as they become available. If you have questions or would like to discuss these comments, please contact Lynne McWhorter of my staff at (206) 553-0205 or at [mcwhorter.lynne@epa.gov](mailto:mcwhorter.lynne@epa.gov).

Sincerely,



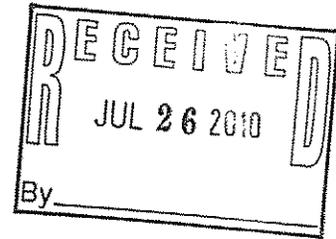
Christine Reichgott, Manager  
Environmental Review and Sediment Management Unit



## Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322  
(360) 574-3058 • Fax: (360) 576-0925  
www.swcleanair.org

July 22, 2010



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

RE: Pacific Northwest Rail Corridor

Dear Ms. Phinney,

The Southwest Clean Air Agency (SWCAA) was recently notified that your agency has issued/will issue a SEPA Determination for the above project. Please be advised that SWCAA administers/enforces a number of regulations that may apply to the proposed project. The applicability of these regulations depends on the exact nature of the project in question. The following paragraphs provide a brief summary of the requirements for the general types of activity that may be affected for this project.

### Asbestos (SWCAA Regulation 476):

- Prior to **demolition or renovation** of a structure, a thorough asbestos inspection must be conducted by an AHERA certified inspector in order to ascertain the presence of asbestos containing material (ACM) in all affected structure(s) or area(s). A copy of the AHERA asbestos inspection report must be posted for viewing at the project site.
- **If the asbestos inspection reveals ACM to be present in the affected structure(s) or area(s):**

ACM **must be** removed, or if appropriate, encapsulated by certified personnel in full accordance with the Southwest Clean Air Agency's (SWCAA) Regulations SWCAA 476 (Standards for Asbestos Control) and with 40 CFR Part 61 Subpart M (National Emission Standards for Asbestos). A **Notification of Demolition and Renovation**, a **Notice of Intent to Remove or Encapsulate Asbestos** and a copy of the AHERA asbestos inspection report for each structure **are required and must be** submitted to SWCAA for approval. There is a **10 business day waiting period** from the time the notices are submitted before asbestos removal, structure demolition or structure renovation can begin. All asbestos **must be** completely removed from the affected structure(s) or area(s) prior to structure demolition or structure renovation taking place.



- **If the asbestos inspection does not reveal ACM to be present in the affected structure(s) or area(s), and the structure is to be demolished:**

*A Notice of Intent to Remove or Encapsulate Asbestos would not be required. A Notification of Demolition and Renovation and a copy of the AHERA asbestos inspection report are required and must be submitted to SWCAA. There would be a **10 business day waiting period** from the time the notification is submitted before the demolition can start.*

- **If the asbestos inspection does not reveal ACM to be present in the affected structure(s) or area(s), and the project involves only renovation and that renovation does not involve the removal of load bearing walls:**

*A Notice of Intent to Remove or Encapsulate Asbestos would not be required. A Notification of Demolition and Renovation would not be required.*

#### **Construction Dust (SWCAA Regulations 400-040):**

- Construction activities have the potential to generate dust nuisances related to the movement of equipment and material handling operations. Creating such nuisances is prohibited by SWCAA's General Regulations. Section 400-040(2) of the general regulations states that "No person shall cause or permit the emission of particulate from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited." Section 400-040(8)(a) further states that "The owner or operator of a source of fugitive dust shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions." All parties involved with the project are required to minimize particulate fall-out and/or fugitive dust through the use of common preventive measures such as water trucks, water sprays, reduced equipment speeds, etc. Violations of the above regulations can result in penalties being assessed against the property owner or project operator.

#### **New Source Review of Air Pollution Sources (SWCAA 400-109,110)**

- SWCAA's General Regulations regulate the installation and/or modification of any building, structure, or facility that emits or may emit an air contaminant. An air contaminant is defined as "...dust, fume, mist, smoke, other particulate matter, vapor, gas, odorous substance, or any combination thereof." Section 400-109 of the General Regulations requires the project proponent to submit an Air Discharge Permit Application for any proposed installation or modification that creates a new or increased source of air contaminants. In addition, Section 400-110 requires the issuance of an Air Discharge Permit prior to commencing construction of any project that constitutes a new or increased source of air contaminants. If the proposed project includes any new or modified air

pollutant sources, the proponent should consult with SWCAA to determine if an Air Discharge Permit application is required.

The proponent of this project may contact SWCAA at 360-574-3058 for more information on the agency's requirements. Notification forms, regulations and other information are available on the internet at [www.swcleanair.org](http://www.swcleanair.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Hallock". The signature is written in a cursive, flowing style.

Tina Hallock  
Secretary

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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

August 9, 2010

Elizabeth Phinney  
State Rail and Marine Office  
WA Department of Transportation  
PO Box 47404  
Olympia, WA 98504-7407

Dear Ms. Phinney:

Thank you for the opportunity to comment on the NEPA Draft FONSI for the Pacific Northwest Rail Corridor project, located from the Columbia River to the Canadian Border as proposed by WSDOT. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**SHORELANDS/WETLANDS: Alex Callender (360) 407-6167**

Wetland impacts are anticipated in the project area which includes different watersheds and jurisdictions. Now would be the time to plan for advanced mitigation. Mitigation site selection should be done at a watershed scale.

Some of the wetland fill and other activities may occur within shoreline jurisdiction. The project's activities and uses in shoreline jurisdiction must be consistent with the shoreline management act and the local shoreline master programs.

**TOXICS CLEANUP: Marv Coleman (360) 407-6259/Craig Rankine (360) 690-4795**

Individual segments of the project should be subject to SEPA process. Please provide township, range and section (T.R.S.) information with those submittals.

**WASTE 2 RESOURCES: Mike Drumright (360) 407-6397**

This is in a planning stage and therefore individual projects mentioned in the plan that may have an environmental impact will be dealt with in its own SEPA process as it relates to that specific project action.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(AW: 10-3644)

cc: Alex Callender, SEA  
Marv Coleman, TCP  
Mike Drumright, W2R  
Craig Rankine, TCP/VFO

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August 6, 2010

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 July 2010 Draft Finding of No Significant Impact (FONSI) for the **Pacific Northwest Rail Corridor, Washington State Segment - Columbia River to the Canadian Border (PNWRC)** project.

While the City of Auburn appreciated the opportunity to meet with WSDOT officials last fall to address our concerns and discuss the PNWRC, we are deeply disappointed that WSDOT has seemingly forgotten those discussions.

At that time, the City of Auburn, along with the Cities of Covington, Maple Valley, and Black Diamond told WSDOT that project environmental documents should discuss how the development and evaluation of service options would occur as the project moves forward in the future. And at that time, WSDOT agreed.

Specifically, in our October 22, 2009 letter commenting on the project's Environmental Assessment (see pages A16-A19 of Draft FONSI), the City identified a number of economic, operational, and environmental reasons why future environmental analyses should consider establishing a station stop at the existing Auburn urban rail station. The station is an existing intermodal transit facility with rail platform and parking facilities, has a central location within and serving an area of high population density, has strong demonstrated rail ridership, and is located within a PSRC-designated Regional Growth Center and Core City. Further, we suggested that the establishment of station stops should be addressed during the project's environmental review as the location of station stops will directly affect a number of environmental elements, including but not limited to transportation, air quality, and energy use and conservation.

WSDOT's response to the City's letter was . . . "As noted in your letter, future project-level documentation should address how plans for expanded intercity 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 in the EA, as shown in the errata section of the FONSI" (letter from Elizabeth Phinney to Cindy Baker, shown on page A-20 of Draft FONSI). However upon

review, we do not find any discussion in the Draft FONSI describing how future station stops will be evaluated.

Moreover, a second letter to WSDOT which was signed by the chief executives of the Cities of Auburn, Covington, Maple Valley, and Black Diamond that addressed the same issue does not appear to have been acknowledged by WSDOT at all (see pages A22-A23 of Draft FONSI). We are not aware of a written response to this letter and none appears in the Draft FONSI. This is particularly troublesome as this letter memorializes the following language jointly developed and agreed to by the four cities during discussions with WSDOT last October, which was to be included in the project's environmental documentation:

*"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." Again, we do not find this language contained in the Draft FONSI.*

The City of Auburn finds the Draft FONSI as currently written to be unacceptable as it is not consistent with WSDOT's commitments to Auburn and other South King County cities last fall and during the agency's response to comments for the project EA. We request that the FONSI be revised to rectify these issues.

Respectfully,



Chris Andersen  
Environmental Protection Manager

Cc: City of Auburn  
Peter B. Lewis, Mayor  
City of Covington  
Derek Matheson, City Manager  
City of Maple Valley  
David Johnston, City Manager  
City of Black Diamond  
Brenda Martinez, Acting City Administrator

City of Auburn

Kevin Snyder, Director; Planning and Development Department  
Dennis Dowdy, Director; Public Works Department  
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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Denis Law  
Mayor

# City of Renton



Department of Community and Economic Development  
Alex Pietsch, Administrator

August 6, 2010

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

VIA: [phinnee@wsdot.wa.gov](mailto:phinnee@wsdot.wa.gov)

**SUBJECT: NEPA Draft Finding of No Significant Impact (FONSI) for the Pacific Northwest Rail Corridor**

Dear Ms. Phinney,

Thank you for the opportunity to provide comments for the NEPA Draft Finding of No Significant Impact (FONSI) for the Pacific Northwest Rail Corridor. We understand that the Draft FONSI is for the proposed service improvements that were evaluated in the NEPA Program Assessment for the Pacific Northwest Rail Corridor, and are being made at the Tier 1 or Corridor level of review.

Regarding the Service Block 3/Tukwila Station – King County project, previous Sound Transit studies have indicated that a significant percentage of passengers at the Tukwila Station will originate from the east side (City of Renton). Therefore, we request that proposed improvements at the Tukwila Station should, in coordination with Sound Transit, include public access from the east for both Amtrak and Sound Transit passengers.

Please contact me if you have any question regarding this letter. I can be reached by telephone at: 425.430.7286 or via email: [jhenning@rentonwa.gov](mailto:jhenning@rentonwa.gov)

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Henning".

Jennifer Henning, AICP  
Planning Manager

cc: Alex Pietsch, CED Administrator  
Gregg Zimmerman, Public Works Administrator  
Chip Vincent, Planning Director  
Rich Perteet, Transportation Director  
Neil Watts, Development Services Director  
Dave Pargas, Assistant Fire Marshal

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**From:** [Phinney, Elizabeth](#)  
**To:** [DuMond, Melissa \(FRA\)](#)  
**Subject:** FW: Comments on PNW Rail Corridor Draft FNSI  
**Date:** Wednesday, August 11, 2010 6:30:17 PM

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**From:** Peter Zahn [<mailto:PZahn@ci.dupont.wa.us>]  
**Sent:** Wednesday, August 11, 2010 3:21 PM  
**To:** Phinney, Elizabeth  
**Cc:** Bill Kingman  
**Subject:** Comments on PNW Rail Corridor Draft FNSI

Elizabeth:

Thank you for the opportunity to review and provide comment on the Draft Finding of No Significant Impact (FNSI). Following our conversation this afternoon, we would like to offer the following comments on the findings for your consideration:

Environmental Commitments, Noise Section

Page 24, Item 50, Section L, Noise, Section VI, Environmental Commitments, of the Draft FNSI states, "If impacts exceed FRA severe criteria for noise impacts, WSDOT will consider specific noise abatement measures..."

DuPont has residential structures within 800 feet of the rail line and within 500 feet of the commuter rail-highway crossing at Barksdale Avenue that is proposed to be improved with horns and bells. Chapter 4 of the DOT document titled, *Transit Noise and Vibration Impact Assessment*, Publication FTA-VA-90-1003-06, dated May 2006, states a noise assessment should be performed to identify locations where a project may cause noise impact. Table 4-1 of the document delineates screening distances for noise assessments. The screening distance for a commuter rail-highway crossing with horns and bells is 1,200 feet. We believe DuPont warrants a noise assessment based on these criteria to determine noise impacts and verify appropriate and effective mitigation measures are incorporated into the design of the related project through DuPont, and feel that the document could more clearly speak to this criteria.

We recommend the Environmental Commitments statement on Page 24 of the Draft FNSI be revised to state that WSDOT will conduct noise assessment if buildings are located within the screening distances indicated on Table 4-1 of Publication FTA-VA-90-1003-06 and propose appropriate and effective mitigation where warranted. Currently, the section states that "... impacts will be further investigated...for those projects that have the potential to cause adverse effects."

Again, thank you for the opportunity to comment. Should you have any questions, please feel free to contact me.

*Peter L. Zahn*  
Public Works Director

City of DuPont  
1700 Civic Drive  
DuPont, WA 98327  
Ph: (253) 912-5381  
Fax: (253) 964-1455  
Direct: (253) 912-5380  
*(Visit our website at [www.ci.dupont.wa.us](http://www.ci.dupont.wa.us))*

Appendix C  
High-Speed Intercity Passenger Rail  
Program  
Washington State Projects Considered  
for Funding



**Washington State Preliminary List**

**Projects required to achieve 88 percent reliability and 2 extra round trips between Seattle and Portland:**

Project Name  
Tacoma – D to M Street Connection  
Advanced Signal System

**Projects required to achieve 88 percent reliability and 2 extra round trips between Seattle and Portland:**

Project Name  
Tacoma – Point Defiance Bypass  
Vancouver – Yard Bypass Track  
Corridor Reliability Upgrades South

**Projects required to achieve 88 percent reliability and 2 extra round trips between Seattle and Portland:**

Project Name  
KMB New Siding  
KMB Toteff Siding Extension  
KMB Kelso to Longview Jct.<sup>6</sup>  
King Street Station Track Upgrades<sup>7</sup>  
Everett – Storage Track  
Two new trainsets

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<sup>6</sup> (Without overpass or underpass in Kelso)

<sup>7</sup> (Without north end improvements and rebuilding bridges for 2nd Ave Ext. and Jackson St.)