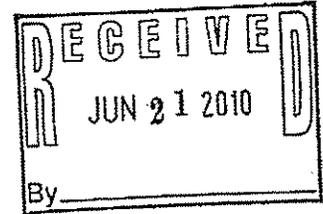




City of Tacoma
Public Works Department



June 14, 2010

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

Subject: Point Defiance Bypass Project New Scoping Period

Dear Ms. Phinney:

Thank you for the invitation to provide input during the scoping period for the new Environmental Assessment (EA) required by the Federal Railroad Administration. The Point Defiance Bypass project has the potential to impact Tacoma with the re-routing of the existing Amtrak Cascades passenger rail service to an inland route.

We received a copy of the project's Environmental Summary that was distributed in June 2008 to satisfy the environmental review requirements of the Federal Highway Administration. We agree that scoping information for the 2008 environmental review should contribute to the new EA. However, the 2008 environmental summary and supporting documents should be updated to reflect current conditions including zoning, traffic data, air quality requirements, development standards, and population.

The EA must address rail crossing safety at City streets for all modes of transportation. The operational analysis for each crossing shall review the use of way-side horns, gates, and medians to promote crossing safety and mitigate noise. Also, the EA should review documents prepared for the Sound Transit Tacoma to Lakewood Extension.

Please notify me to attend project meetings and public meetings held to present project information and to solicit public feedback. We appreciate the opportunity to contribute to the planning of this important transportation project.

Sincerely,

Chris Larson, P.E.
Assistant Engineering Division Manager
253-591-5538
clarson@cityoftacoma.org

cc: Shirley Schultz, Principal Planner, Bldg & Land Use Services



June 14, 2010

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

Reference: Point Defiance Bypass Project New Scoping Period

Dear Ms. Phinney:

This letter is in response to your recent correspondence dated May 13, 2010 of the new scoping period for the Point Defiance Bypass Project Environmental Assessment (EA). The results of the EA is critical to Clover Park School District as the project is in the vicinity of several elementary schools (Southgate, Lakeview, Tyee Park and Tillicum); divides our district and will have a direct impact to the students of Clover Park School District as bus transportation will be impacted by the trains.

The district submits the following scoping comments based on the categories listed:

Noise and Vibration

The district is extremely concerned about the ability to provide an educational environment conducive to uninterrupted learning for our students and teachers. This is essential for Southgate and Tyee Park Elementary as these schools run parallel to the rail grade tracks.

We request that the EA investigate the noise and vibration impacts that will result from the project; report to the district the conclusion and recommendations to remedy noise and vibration concerns.

Traffic Impacts

The project involves multiple tracks in which district school buses must travel across as the rail grade runs through the district boundary. The service hours recommended for the project run in correspondence with bus delivery of students.

The mission of the Clover Park School District is to teach all children what they need to know to succeed and contribute to their community.

Ms. Elizabeth Phinney
June 14, 2010
Page two

We request that the EA investigate and report to the district the conclusion and recommendations regarding the bulleted points below that relate to the Point Defiance Bypass access of rail grades from Barksdale Avenue (Exit #119) to Steilacoom Boulevard SW.

- Projected rail use
- Projected service times
- Projected number of rail cars at switching depots
- Number of vehicles impacted
- Traffic flow at interchange locations
- Traffic flow on local street network
- Queuing of vehicles at Interstate 5
- Queuing of vehicles at each interchange location / rail grade
- Potential traffic delays

Safety

Location of Tracks

The location of the rail grade tracks next to two elementary schools poses a safety concern as the playground and school is parallel to the rail grade. A chain link fence is currently the only separation.

We request that the EA investigate and report to the district the conclusion and recommendations to mitigate these concerns.

Pedestrian Traffic

Although Clover Park School District works very hard to ensure students that reside on the east side of the tracks utilize district buses or community bus service versus walking across the tracks, pedestrian crossing is a concern.

We request that the EA investigate and report to the district the conclusion and recommendations regarding pedestrian traffic.

Hazardous Cargo

The transport of hazardous cargo is a major concern due to the close proximity of schools; and increase potential for accidents due to the number of rail grade crossings located within the school district.

We request that the EA investigate and report to the district the conclusion and recommendations regarding hazardous cargo.

Ms. Elizabeth Phinney
June 14, 2010
Page three

Environmental and Emission Requirement

Environmental and emission impact to close proximity of schools may create potential health hazards to students (i.e., medically sensitive).

We request that the EA investigate and report to the district the conclusion and recommendations regarding environmental and emission requirements.

Emergency Response Plan

Since the Point Defiance Bypass flows throughout Clover Park School District runs parallel to schools that serve elementary-aged students and is a vast change from existing rail service experienced by the district and community, a comprehensive emergency response plan including multiple agencies, cities and counties must be considered.

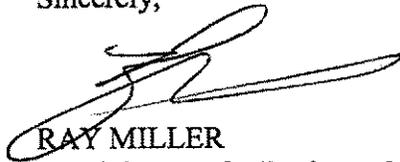
We request that the EA investigate and report to the district the conclusion and recommendations to address or mitigate an emergency situation (i.e., derailment, hazardous cargo, school evacuation at Tillicum Elementary, etc.)

Furthermore, the electorate supported the consolidation of Oakwood and Southgate Elementary schools. The district is evaluating various sites for the placement of a consolidated elementary school that may hold 650 students. We request that the EA investigate and report to the district conclusions and recommendations for the replacement of an elementary on Southgate Elementary property that will support a student population of 650 students.

Thank you for this opportunity for input of our concerns. Should you have any questions regarding the information provided, please do not hesitate to contact myself or Delphie Nielsen, Director of Transportation at (253) 583-5496 or e-mail at rmiller@cloverpark.k12.wa.us.

We look forward to this information and the opportunity to discuss these issues with you at your earliest convenience.

Sincerely,



RAY MILLER
Administrator for Business & Operations

cc: Dave Bugher, City of Lakewood
Delphie Nielsen, CPSD Transportation

Phinney, Elizabeth

From: David Bugher [DBugher@cityoflakewood.us]
Sent: Friday, June 18, 2010 7:41 AM
To: Phinney, Elizabeth
Subject: Transmittal of Point Defiance EA Scoping Comments
Attachments: 20100618072952847.pdf

Attached are Lakewood's scoping comments. If you have any questions, contact me using me e-mail account or telephone number, 253/983-7739.

Dave Bugher
City of Lakewood
Assistant City Manager for Development Services/
Community Development Director

Disclaimer: Public documents and records are available to the public as required under the Washington State Public Records Act (RCW 42.56). The information contained in all correspondence with a government entity may be disclosable to third party requesters under the Public Records Act.

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June 17, 2010

Douglas G. Richardson
Mayor

Don Anderson
Deputy Mayor

Claudia B. Thomas
Council Member

Walter Neary
Council Member

Michael D. Brandstetter
Council Member

Mary Moss
Council Member

Jason Whalen
Council Member

Andrew E. Neiditz
City Manager

Heidi Ann Wachter
City Attorney

Alice M. Bush, MMC
City Clerk

Washington State
Department of Transportation
Elizabeth Phinney
WSDOT State Rail & Marine Office
PO Box 47407
Olympia, Washington 98504-7407

Dear Ms. Phinney:

In correspondence dated May 13, 2010, your office submitted to the City of Lakewood notice of the new scoping period for the Point Defiance Bypass Project Environmental Assessment (EA). Various departments within the City have reviewed the proposal and collectively have offered the following scoping comments. Scoping comments are divided into nine categories: land use; relationships with other regional transportation projects; boundaries of the EA; public participation; traffic and circulation; noise and vibration; safety; environmental justice; and lastly other. Following each category are listed impacts and recommendations/comments.

Land Use

Impact: The Point Defiance Rail Bypass Project has potential impacts on land use and development patterns. The current rail line divides the urban core of the City of Lakewood including transportation systems into eastern and western halves. WSDOT Rail Division should be reminded that this rail line is infrequently used. Most citizens rarely see trains excepting minor use by Tacoma Rail and military deployments where heavy equipment is transported from Joint Base Lewis McChord (JBLM), through the City of Lakewood, to the Port of Tacoma or vice versa. The introduction of Amtrak services, within a built-out urban community, could potentially have significant changes in land use and transportation patterns.

Recommendations/Comments: For consistency sake, WSDOT Rail Division should review the City of Lakewood Comprehensive Plan, the Tillicum Neighborhood Plan, the Lakewood Sound Transit EA, and the Draft JBLM Growth Coordination Plan when analyzing the potential impacts of the Point Defiance Rail Bypass project.

Impact: There are commercial and industrial buildings that are located immediately adjacent to the Sound Transit railroad right-of-way¹. All of these buildings pre-date city incorporation and many were likely constructed without building permits. A significant number of these businesses use the railroad right-of-way for vehicle parking and storage. Some businesses may be using the right-of-way without authorization from Sound Transit. Sound Transit has

¹ The railroad right-of-way used to belong to Burlington Northern and Santa Fe. Sound Transit purchased the property for commuter rail operations. Sound Transit maintains the right-of-way and manages existing leases.

taken steps to have businesses obtain leases although the current status of specific properties is unknown by city staff. This situation is found along the entire right-of-way with a greater degree of encroachment south of Bridgeport Way SW. The encroachment issue is most acute in Tillicum.

Sound Transit's efforts to address rights-of-way encroachment could place undo financial hardships on some of these businesses and may even result in business closures. This situation is disconcerting. The encroachment issue in Tillicum is beyond the scope of Sound Transit's commuter rail project, and while it may be considered simply as a housekeeping matter, it is a necessary precursor to implementing the Point Defiance Rail By-Pass Project. Further, many of the commercial buildings in Tillicum adjoining the railroad right-of-way are in a deteriorated condition. The Assessor's Office has rated the building quality for this area. Almost 50% of these buildings have been designated either "Low" or "Low Plus." Amtrak trains traveling at high speeds in close proximity to existing development will undoubtedly impact these areas; however, the extent of the impact is not known at this time.

Recommendations/Comments: It is recommended that the EA address the following concerns:

Sound Transit should provide WSDOT Rail Division and the City of Lakewood with information as to the status of leases and encroachment within the railroad corridor.

Sound Transit should be included in the EA process and be listed as either a Joint-Lead or as a Cooperating Agency. Sound Transit is already acting as the construction lead for the Point Defiance Rail Bypass Project and as such is a potential beneficiary in the event commuter rail moves from Lakewood, to DuPont and finally Olympia. It is also suggested that Sound Transit halt any formal actions on railway encroachment until the EA process has been completed.

Would increased rail traffic and at the speeds proposed, damage the structural integrity of the existing commercial and industrial buildings found along the railroad right-of-way?

Would Sound Transit who owns the railroad real property, under which the existing vehicle parking and storage areas are located, force removal of these facilities in order to support the Point Defiance Bypass Project? Such action could result in the closure of existing businesses. In Tillicum alone, 53% of the commercial properties adjoining the rail corridor encroach in the railroad right-of-way. Encroachment issues are also found on other portions of the rail corridor but not to the same extent as Tillicum. This impact is significant.

Would WSDOT Rail Division recommend that the City revise its development standards and incorporate setbacks from rail lines? Again such action poses unique problems. Many existing businesses would be declared nonconforming uses and new development, given existing site constraints, may be prohibited altogether.

Relationship to Other Regional Transportation Projects

Impact: Besides separating heavy rail from Amtrak operations, does the Point Defiance Bypass Project integrate with other regional transportation programs?

Recommendations/Comments: WSDOT Rail Division should identify the integration and/or incompatibility of the Point Defiance Rail Bypass Project with other existing transportation, commuting, and transit proposals affiliated with the Puget Sound Regional Transportation Plan, Sound Transit and Pierce Transit.

Boundaries of the Environmental Assessment (EA)

Impact: The exact boundaries of the EA have not been determined. It is known that WSDOT Rail will examine rail crossings and related impacts within the City of Lakewood. However, similar impacts are likely to occur at rail crossings located in Tacoma and JBLM.

Mitigations: WSDOT Rail Division should include a map identifying the geographic area of the EA.

Further, the rail division should expand its proposed EA to include crossings in the City of Tacoma and JBLM. Eleven crossings should be included as part of the EA process:

- 56th Street SW (Tacoma)
- 72nd Street SW (Tacoma)
- Steilacoom Boulevard SW
- 100th Street SW
- 108th Street SW
- Bridgeport Way SW
- Clover Creek Drive SW
- North Thorne Lane SW
- Berkeley Avenue SW
- Division Drive (JBLM)
- Barksdale Avenue (DuPont)

Public Participation Plan

Impact: The WSDOT Rail Division has focused its efforts at acquiring federal stimulus dollars for rail transportation. As an element of the EA, it is recommended that WSDOT Rail prepare a written public participation plan which outlines public notification and participation procedures. WSDOT Rail should outline fundamental public participation requirements for meetings, publications, the use of its website, key decisions and activities, and additional outreach efforts.

Recommendations/Comments: It is recommended that WSDOT Rail incorporate the Public Participation Plan used by the Puget Sound Regional Council. The Plan was developed in consultation with member organizations, federal, state, and local governments and agencies, cities, counties, transit agencies, and interested parties.

Traffic and Circulation

Impact: The use of the Sound Transit rail right-of-way for Amtrak operations will have significant impacts on this community. This rail line has been practically abandoned for 40 or more years. Since that time, the community of Lakewood has significantly changed. What was once a low density suburb of Tacoma is now an urban community and the second largest city in Pierce County. One of the largest industrial parks in the state is located in Lakewood and adjacent to the railroad right-of-way. Existing streets that cross the railroad

tracks move large volumes of vehicles. All Lakewood at-grade crossings are on and/or adjacent to major corridors within City of Lakewood. Impacts to traffic include interruption of regular traffic flows. At some interchange locations where the railroad tracks are too close to the I-5 right-of-way, there are significant queuing problems which cause back-ups on city streets. With the growth of JBLM, traffic problems have become even more problematic both on the state highway system and on local city streets.

Recommendations/Comments: WSDOT Rail Division should coordinate with WSDOT Highways regarding impacts that rail operations may have on the I-5 right-of-way.

WSDOT Rail Division should evaluate the traffic impacts at all proposed at-grade crossings within the City of Lakewood. The EA should analyze impacts in terms of delays at all crossings. Specifically, a focused traffic analysis should be incorporated into the EA for the intersections of Bridgeport Way SW and I-5; Bridgeport Way SW and Pacific Highway SW; North Thorne Lane SW and I-5; Berkley Avenue SW and Union Avenue SW; and Berkeley Avenue SW and I-5. The purpose of the analysis would examine traffic queues exceeding ramp storage capacities at State highway interchanges. Focused traffic analysis may also be necessary if there is an increased risk of a potential traffic accident occurring within the confines of the EA project boundaries.

WSDOT Rail Division should upgrade traffic signal timing to set up "flush" patterns thereby mitigating train crossing interruptions to traffic flow.

WSDOT Rail Division should install new traffic signals at known, warranted intersections (i.e. Steilacoom Boulevard SW and Durango Street SW) where the Level of Service (LOS) has already shown that increased rail traffic will impact existing traffic flow.

WSDOT Rail Division should examine all intersections that could be impacted by rail activity although not necessarily adjacent to the railway right-of-way. The intersection of Steilacoom Boulevard SW and Durango Street SW has already been mentioned, but other intersections include 100th Street SW and 47th Avenue SW and 108th Street SW and Halcyon Road SW.

Impact: WSDOT Rail Division proposes to eliminate left hand turns out of Halcyon Road SW onto 108th Street SW. This proposal will force the neighborhood to use Montgrove Avenue SW as the major point of ingress and egress.

Recommendations/Comments: Neighborhood traffic calming measures should be considered.

Impact: Of the eight rail crossings in Lakewood, three of them are located within the City's core (Steilacoom Boulevard SW, 100th Street SW, and 108th Street SW) moving a significant number of vehicles per day. During peak demand/travel periods, the movement of Amtrak trains through the City at the same time that Sound Transit commuter rail is in operation, either in the early morning hours or in the evening, has the potential to degrade the LOS at the rail crossings and nearby streets during peak commute periods.

Recommendations/Comments: The timing of all rail operations should be accounted for as part of the EA. Where it is appropriate, train schedules should be modified to reduce the level of impact.

WSDOT Rail Division shall monitor rail impacts to insure that roadway segments and intersections remain at an acceptable LOS, but in no case shall the improvements negatively affect existing intersections. Should the LOS reach unacceptable levels, WSDOT Rail Division should accelerate measures to fully mitigate impacts. To that end, a transportation management plan (TMP) that identifies potential traffic impacts and keeps the impacts within acceptable limits as approved by the City should be prepared.

Please note that there are other related traffic and circulation comments contained within this letter under the heading of Safety.

Noise & Vibration

Impact: Amtrak rail traffic will generate noise and vibration. The EA should assess the impacts of noise associated with the increase in Amtrak rail traffic, including assessment of noise pollution on property values, and the general nuisance factor of noise that can be heard from residences or recreational areas adjoining the railroad right-of-way.

Recommendations/Comments: Decibel levels of the trains should be evaluated according to their ability to meet acceptable standards.

All noise and vibration impacts should be fully analyzed and presented in the EA, and the EA should include commitments to implement measures to adequately mitigate noise and vibration impacts associated with the project.

Establish Quiet Zone Designations and install all related improvements through the City of Lakewood to improve the quality of life of the local community by eliminating unwanted train horn noise.

Safety

Impact: The existing railroad right-of-way which runs through the City is not often used, except for occasional use by Tacoma Rail or the military to move heavy freight from JBLM to the Port of Tacoma or vice versa. When in use, because of poor track conditions, train speeds are limited to 10 MPH. Residents who live next to the tracks, most of which are low-income, have grown accustomed to using it as a pedestrian trail even though technically such activity is trespassing. WSDOT Rail should recognize that because of low train volume and slow speeds, the general public, at this point, sees no safety problem. Use of the tracks as a pedestrian corridor is particularly common south of 108th Street SW and extending through the residential sections of the City and the Tillicum community. For reasons of safety, with the increased rail activity proposed by Amtrak, the use of the rail corridor by pedestrians will need to cease.

Recommendations/Comments: WSDOT Rail should develop an extensive pedestrian rail safety management plan in consultation with the City of Lakewood.

Vandal-resistant fencing or barriers along any remaining at-grade portions of the alignment should be a requirement of the project.

WSDOT Rail should provide a pedestrian path connecting the Tillicum and Woodbrook Neighborhoods (North Thorne Lane SW to Gravelly Lake Drive SW) with the rest of the City of Lakewood.

Additionally, the City has received a \$400,000 grant to design a pedestrian bridge across the railroad tracks from the Sound Transit Rail Station to the Lakeview community. Lakewood will soon be making applications for transportation enhancement program grants to construct the pedestrian bridge and other related improvements. WSDOT Rail Division should support the City's efforts in obtaining grants funds to construct the bridge and thereby reduce Sound Transit's and WSDOT's liability.

Impact: Building a new at-grade railroad crossing can negatively impact safety of an existing crossing due to limiting the configuration of warning devices, limiting the geometry of roadway and sidewalk, and obstructing visibility of warning devices or an approaching train.

Recommendations/Comments: The project needs to provide overall improvement by constructing a grade separation of all the tracks at each crossing.

Impact: The Point Defiance Bypass Project may have impacts on the City's public safety services in terms of emergency responses since the rail line splits Lakewood into east and west halves. In the event of a train derailment or other serious accident, there could be serious issues with first responders, utility providers, and the Clover Park School District.

The situation is even more acute within the Tillicum community. Tillicum is separated from the rest of the city by I-5, American Lake and bordered on one side by a National Guard facility. Again, should a train derailment occur here, the entire community would be completely cut-off. There are already frequent occasions where police and fire, responding to 911 calls, cannot access Tillicum because of traffic congestion on I-5.

Recommendations/Comments: In order to retain emergency access to these areas of Lakewood WSDOT should construct a new two-lane southbound connector road southwest of the railroad tracks between Gravelly Lake Drive SW and North Thorne Lane. This connector road is known as the Gravelly-Thorne Connector and is currently under design; however, no funds have been allocated to construct the connector road at this time.

Another solution is the construction of a new North Thorne Lane and I-5 Interchange. This project is part of the Cross Base Highway. Design drawings have already been prepared and WSDOT Highways has initiated a process to acquire property for additional right-of-way. Once again, funds have not been allocated for construction.

Environmental Justice

Impact: Sixteen percent of the population in Lakewood lives below the federal poverty level. Three low income neighborhoods adjoin the railway corridor: Lakeview; Tillicum; and Woodbrook. Lakewood also has a very diverse population; in fact, it is probably one of the most diverse communities in the entire state. Sixty two percent of the population in Lakewood was non-Hispanic white. Almost 22% of Lakewood residents over 5 years of age speak a language other than English.

Recommendations/Comments: Incorporate WSDOT's current environmental justice policies into this EA.

Identify how the proposal may affect the mobility of low-income or minority populations in the Lakeview, Tillicum and Woodbrook neighborhoods. Provide specific, appropriate mitigation measures for any anticipated adverse impacts on these community members located in these three neighborhoods.

Include opportunities for incorporating public input to promote context-sensitive design, especially in the Lakeview, Tillicum and Woodbrook neighborhoods.

Other

Impact: The use of diesel engines to operate Amtrak trains may create nuisance odors for residential properties adjoining the railroad right-of-way.

Recommendations/Comments: A discussion of whether the project would create nuisance odors should be included in the EA.

Impact: As was mentioned previously, Tacoma Rail and JBLM currently use the train line through Lakewood to move heavy rail. Heavy rail activity, however, is significantly limited because of the poor condition of the tracks, but the old tracks are ultimately to be replaced with new tracks. New track installation is currently underway at least down to Bridgeport Way SW, in part to support Sound Transit's commuter operations in Lakewood. When a full track replacement occurs, Lakewood may see increased heavy rail traffic. Heavy rail moving southward from Tacoma appears unlikely because of the existing grade (trains would have to traverse a fairly steep incline). However, heavy rail moving northward appears more likely.

Recommendations/Comments: Lakewood would like additional information on the use of the railroad corridor for heavy rail operations.

Thank you for the opportunity to comment. If you have follow-up questions, please contact me at your convenience. My e-mail address is dbugher@cityoflakewood.us. You can also reach me at 253/983-7739.

Respectfully,



M. David Bugher
Assistant City Manager for Development Services/
Community Development Director

Copies to:

Lakewood City Council
Andrew Neiditz, City Manager
Heid Wachter, City Attorney
Don Wickstrom Public Works Director
Dick McKinley, Public Works Director, City of Tacoma
Peter, Zahn, Public Works Director, City of DuPont



June 18, 2010

Elizabeth Phinney
Washington State Department of Transportation
WSDOT State Rail & Marine Office
PO Box 47407
Olympia, Washington 98504-7407

Dear Ms. Phinney:

I have received the correspondence from your office, dated May 13, 2010, providing notice of the new scoping period that has been initiated as part of the project-level Environmental Assessment (EA) for the Point Defiance Bypass Project. The City appreciates the opportunity to provide comments in the early stages of this process. We have reviewed information on the project proposal and have also conferred with the City of Lakewood regarding their forthcoming scoping comments. There appears to be several common concerns as to project impacts for communities abutting the rail corridor within the project area. Below are several issues and comments for consideration in scoping the EA and project review process.

General Project Impacts

As we understand, the Bypass Project would result in rerouting high-speed passenger trains (Amtrak Cascades) to an existing rail line along the west side of I-5 through Tacoma, Lakewood, and DuPont. This existing rail line currently has limited use, with approximately 2 freight rail movements per day travelling at 5-10 miles per hour. With the rerouting of passenger trains, this rail corridor will experience between 10 and 16 additional high speed passenger trains travelling at 79 miles per hour through our cities. The project will result in substantial increases in the frequency of train movements and travelling speeds on the rail line from current conditions and will have an impact on the surrounding communities, businesses, and traffic flows. While it is our understanding that the number of freight trains is not expected to increase after completion of the project, the upgraded rail could also allow freight movements to increase up to 40 miles per hour – this could potentially generate additional heavy rail use in the future.

Boundaries of the Environmental Assessment (EA)

It is unclear if the exact boundaries of the EA have been determined. It is known that WSDOT Rail will examine rail crossings and related impacts within DuPont and Lakewood. However, similar impacts are likely to occur at rail crossings located in Tacoma and Joint Base Lewis-McChord. It would likely be beneficial to include a map identifying the geographic area of the EA as the process moves forward.

Transportation and Mobility

The use of the rail corridor for Amtrak operations will likely have significant impacts on traffic flows in and around the communities within the project area. The areas adjacent the rail corridor through DuPont and Lakewood is already a congested zone for traffic flows and circulation. Between the Bridgeport and Mounts Road interchanges (the Barksdale interchange is of particular interest to our community) traffic flows can become highly congested especially during peak commute times. This is a growing concern as continued growth of our local communities and the adjacent Joint Base has occurred. While long-term solutions to this issue are needed and being explored, the proposed increases in rail usage and potential for added conflicts with rail and vehicles during peak commute times is likely to exacerbate the problem.

The existing roadway that crosses the railroad tracks at the Barksdale interchange currently moves large volumes of vehicles and serves as a major access point into the City and to/from nearby communities. Impacts from the project will likely further interrupt regular traffic flows both here and at other crossings,

City of DuPont
1700 Civic Drive
DuPont, Washington 98327
253-964-8121 phone
253-964-3554 fax

and could result in additional queuing and stacking problems. This could create additional back-ups onto city and county streets, Joint Base access gates, and state highways and interchange areas. There will likely also be impacts to pedestrian and bicycle movements at these rail crossings. These issues should be carefully reviewed in the EA process beyond train crossing time. The project review should address rail and non-rail mobility and conflicts to ensure that the proposed improvements will not generate further adverse impacts to roadways, intersections and interchange movements. The schedules and timing of rail operations should also be considered in this review and where appropriate, train schedules should be modified to reduce the level of impact at existing crossings during peak commute and traffic flow periods.

The project proposes to separate heavy rail operations from Amtrak passenger rail operations, to 'improve service' and 'reliability' for passenger and freight rail. The project will also allow extension of Sounder service through a portion of the corridor with the planned rail upgrades, although it is likely to do little to reduce congestion – a prime goal of passenger/commuter rail. There are potential traffic conflicts and safety concerns at rail crossings that may actually increase congestion for local commuters and freight. Potential users of passenger rail services from the DuPont and Joint Base areas must use other modes of transportation to travel to rail access stations, and while there is a possibility that Sounder service could be extended at some point to DuPont, it is questionable this will occur in the near future. Reduction in vehicle trips from the project appears unlikely. Project benefits/impacts should be weighed.

The Bypass Project review should also consider integration and/or incompatibility with other regional transportation, commuting, and transit proposals within the region. How does the project fit with other transportation and freight mobility plans in the region? WSDOT and Pierce County roads/highways divisions, local transit authorities, and other impacted agencies should be included in the EA process.

Land Use and Property Impacts

The Point Defiance Rail Bypass Project will have potential impacts on both existing and future land use and development patterns. The current rail line parallels I-5 through DuPont and has a grade-crossing at the Exit 119 interchange area. There are commercial and residential buildings adjacent and near the railroad right-of-way within the project area, which will undoubtedly be impacted by Amtrak trains traveling at high speeds in close proximity to this existing development. As part of identifying the extent of these impacts, noise and vibration on adjacent development areas should be carefully and fully reviewed during the EA process to assess the potential impacts on property values and the general nuisance factor of noise that can be heard from properties adjoining or near the railroad. Additional safety measures should also be considered, such as fencing or barriers to separate rail and adjacent uses. Comprehensive Plans and known development activities adjacent to the project area should also be considered in this review.

Other General Comments

The City recommends an increased public participation and outreach effort occur during the EA to ensure that concerns of interested parties are addressed. The EA should seek to address some basic public concerns: are the proposed improvements to at-grade crossings adequate to mitigate the substantial increases in rail usage and travelling speeds; does the project appropriately balance mitigation of impacts along the corridor with the projected benefits the project seeks to provide? To address these concerns, we recommend that opportunities to provide separation of rail and roads at existing at-grade crossings be more closely considered and more fully reviewed during the EA to limit project impacts to the rail corridor.

Thank you for the opportunity to comment. We look forward to our continued involvement in the project Environmental Assessment. Please feel free to contact me at (253) 912-5380 or via e-mail at pzahn@ci.dupont.wa.us if you have any questions, or to discuss additional EA process participation.

Sincerely,



Peter Zahn
Public works Director



STATE OF WASHINGTON
MILITARY DEPARTMENT
Camp Murray, Washington 98430-5000

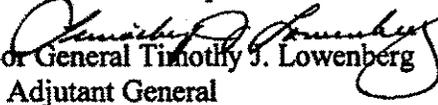
RECEIVED

JUN 30 2010

Office of the Secretary
Department of Transportation

June 28, 2010

TO: Paula J. Hammond, Secretary
Department of Transportation

FROM: 
Major General Timothy J. Lowenberg
The Adjutant General

SUBJECT: Point Defiance Bypass Project

The Military Department is currently in the design stages of relocating its main gate into Camp Murray. This is due in part to the proposed Department of Transportation (DOT) high speed train crossing and I-5 Ramp/Berkeley Street revision. Our Department has been working with DOT and local communities on the impacts of these issues.

We recognize the safety issues of the high speed train crossing through our already congested roads and intersections. Several of our concerns are noted below as well as suggested solutions for your consideration.

1. Traffic gridlock and safety concerns will increase with the projection of 14 trains per day at 79 MPH at the two rail crossings of Berkeley Street and Thorne Lane. The rail section along this area should be vertically separated in the future to minimize traffic impacts at these two intersections.
2. Several Camp Murray buildings are close to the existing track. Noise levels when trains pass can be a significant issue. The windows of the buildings along the rail road side should be replaced with sound proof windows to minimize the impacts of the noise pollution.
3. Any additional costs associated with the relocation of the Camp Murray gate that are above and beyond normative costs should be shared to help leverage preexisting federal funding into the project.
4. A rail station closer to one of the main access points to Joint Base Lewis McChord and Camp Murray would greatly expand public transportation options. Public transportation improvements now and in the future will be an important element to the Armed Forces meeting objectives related to energy savings and reduction of greenhouse gases.

The Military Department understands the challenges of improving the traffic infrastructure that supports the community at large and the readiness of the Armed Forces. We hope to work cooperatively with you to achieve a successful project.

Scan - Lenzi Rye/Reinmuth/Witt/Daughton 6/30/10