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October 22, 2009

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

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

Dear Mr. Bell:

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

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

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 This information is outdated and greatly underestimates the number of fish bearing waters.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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Elizabeth Phinney
Rail Environmental Manager
State Rail and Marine Office

ATTACHMENT C