



October 26th, 2016

Angie Brewer, Planning Director
Wasco County Department of Planning and Economic Development
2705 East Second Street
The Dalles, Oregon 97058

Re: Union Pacific Railroad Second Mainline Track Project – PLASAR-15-01-0004

At a City Council meeting on August 17, 2016, the Mosier City Council voted to submit the following comments on the Union Pacific Railroad second mainline track expansion proposal.

The Mosier City Council, acting on behalf of its constituents who have recently been severely impacted by an oil train derailment, requests denial of this project application based on these concerns:

- increased fire hazards
- negative impacts to public health and safety
- safety concerns regarding river access
- significantly increased noise disturbance that will impact economic development and quality of life
- impacts on Mosier wetlands
- scenic impacts

While the application to the County only addresses a project area that lies just outside of the City of Mosier, this project will have "cumulative adverse impacts" to the entire National Scenic Area and all of the Urban Exempt Areas within the Gorge. These cumulative adverse impacts are not adequately addressed in the proposal and technical expertise is needed to better understand the risks and how to mitigate those risks. Wasco County Planning Staff are not technical experts on rail safety and the Wasco County Land Use Development Ordinance does not have specific criteria to apply to this proposal to ensure that "cumulative adverse impacts" are not created as a result of this project.

Public Health & Safety and Fire Hazards:

The Management Plan for the Columbia River Gorge National Scenic area requires that "cumulative adverse impacts must be avoided, minimized, or mitigated." The current level of UPRR operations and maintenance standards has proven inadequate to address threats to the communities and the natural

resources of the Columbia River Gorge. In this case, the only mechanism to limit more exposure to threats to Scenic, Natural, Cultural, and Recreational resources and to limit more exposure to threats to public health and safety is to maintain the current level of train infrastructure and train traffic in the Scenic Area. Therefore the City agrees with the proposed condition #15 that UPRR stay within the existing range of 20 to 30 trains per day as stated in the application materials.

Furthermore, because any conditions of approval by the Wasco County Planning Department will be unable to mitigate the risk or to minimize the exposure to risk by limiting the hazardous materials that the trains are carrying, the only mechanism by which Wasco County can limit its exposure to these hazards is to not authorize more track and thus more train traffic.

If the permit is approved, the Mosier City Council requests additional conditions of approval that would require a broader process to address safety concerns, including engaging the technical expertise necessary to develop meaningful and binding requirements. The Mosier City Council recommends a process through which topical experts are hired to identify and address Mosier's rail safety concerns.

The City agrees with the Condition #17 – that UPRR will provide regular training to Gorge Fire Departments. However, this does not ensure that “the use or development will not significantly increase fire hazard, fire suppression costs or risks to fire suppression personnel.” This is an example of a criterion that requires further analysis by technical experts in the field of rail safety to truly understand and quantify the increased fire hazard associated with the proposed development. Further, the City of Mosier is concerned about the potential negative impacts on public health and safety associated with the increased fire risk.

Safety Concerns regarding River Access:

Thanks to partnership efforts between UPRR, the City of Mosier, and ODOT in 2015, Mosier now has one seasonal public access to the Columbia River. However, this access is on the far west end of town (Rock Creek), out of sight of downtown Mosier, so that most visitors are unaware that there is a connection between Mosier and the Columbia River. Double tracks would only magnify that visual and physical barrier. Communities like Hood River and The Dalles have created multiple connections to their waterfront areas that allow for significant economic development and quality of life opportunities. The City Council fears that the Double Track project will make this option less feasible.

The City Council is also concerned that because many residents currently cross the tracks at the downtown location illegally, that this practice would become far more dangerous with two tracks and with two trains running in opposite directions, and that community members would be far more likely to be killed or injured if the double track project is approved.

During the Mosier Train Derailment response, fire fighters were unable to access needed Columbia River water because the City's only access at Rock Creek was blocked by the derailed and burning cars. This experience underscores the community's pressing safety needs for a second access and a year round access to the Columbia River.

A pedestrian underpass that would link downtown Mosier to the Columbia River and to the Mosier Waterfront Park trail, and year round access at Rock Creek would resolve these issues, but the City will never be in a financial position to ever contemplate such projects.

Noise Impacts:

The existing noise impacts of one train track are significant for the residential and business communities. Next to safety fears, train noise, and specifically the high pitched screeching of metal on metal, has the greatest impact on the Mosier community. If the proposed project is allowed to increase train traffic, the Mosier community will experience an increased level of noise disturbance, which not only affects all homes and residents but directly affects economic development opportunities downtown.

Wetlands Impacts:

The City also requests that wetland mitigation efforts be expanded to directly address the areas of impact and that preference be given to wetland mitigation projects that have multi-benefits to the residents of Mosier. Several local wetlands projects with significant public value have already been identified by a team of UPRR, City of Mosier, Mosier Watershed Council, and Wasco County Soil and Water Conservation representatives who worked with a local stream restoration consultant in 2014.

Conclusion:

While the City has been working with UPRR on this proposal for several years to find mutually beneficial aspects of the project, such as local wetland mitigation projects and dedication of UPRR lands to the City of Mosier, the City Council feels that increased risks of adding more train traffic in the Gorge is too great for the residents of Mosier to bear. Mosier residents feel that they will receive no economic benefits from the proposed project, but their perception is that they will receive all of the risk.

The only way that the City of Mosier could advocate anything but opposition to this project is if UPRR would be required to develop and implement significant changes in the way that train traffic safety and access to the Columbia River are addressed in the National Scenic Area of the Columbia River Gorge.

Sincerely,

Arlene Burns

Arlene Burns, Mayor
City of Mosier