

From: [Council](#)
To: [Ashley Ubil](#)
Subject: FW: bulk storage of oil and coal on railroad tracks should be regulated
Date: Wednesday, June 05, 2019 9:37:12 AM

From: WENDY HARRIS [mailto:w.harris2007@comcast.net]
Sent: Friday, May 31, 2019 6:27 AM
To: Barry Buchanan; Barbara Brenner; Satpal Sidhu; Rud Browne; Tyler Byrd; Carol Frazey; Council; Todd Donovan
Subject: bulk storage of oil and coal on railroad tracks should be regulated

Dear Council:

Could you please ensure that this letter from 4.24.18 is listed along with other public comments on the Cherry Point Comp. Plan. It was never associated with the other public letters from this time period and now the public comments on Cherry Point have been limited to a much smaller period of time than was listed before. Right now the county website over covers 2016 and 2017. I would appreciate it if you could read my comment if you did not see it, and then find out what is happening with the county website and why this letter was not posted? I have been trying to advocate for treating idling trains as part of the Cherry Point industry which is polluting our community.

Thank you, Wendy Harris

From: Wendy Harris <w.harris2007@comcast.net> To: county council <council@co.whatcom.wa.us> Date: April 24, 2018 at 5:24 AM
Subject: bulk storage of oil and coal on railroad tracks should be regulated

Dear County Council:

This recent Sightline article highlights efforts by municipalities in the Northwest to push back against fossil fuel facilities and the Cascadia Law Group article produced for the council received a favorable comment.

<http://www.sightline.org/2018/04/23/how-northwest-communities-continue-to-stop-fossil-fuel-projects-before-they-start/>

Of particular interest to me was the actions by the City Council of Hoquiam, Washington, prohibiting the **bulk storage of oil**. The intent of the amendments was a comprehensive defense against crude oil development: to prohibit the licensing, regulation, location, and permitting of wholesale liquefied petroleum storage, handling, and sales facilities. Although planners initially drafted a prohibition on “sales,” the hearing examiner recommended removing that term, so the **final recommendation limited the focus of the amendments to storage and handling**.

I believe we have a similar problem here in an unfamiliar form. BNSF regularly leaves its trains idling for hours at four different locations that I know about. This Friday evening, after midnight, I documented this problem with trains being left on tracks near residential areas, either idling, or at best, not moving:

- There are liquified petroleum trains left for long periods in Blaine by the marina and Drayton Harbor, partially hidden out of sight.
- The Loomis Trail/Portal Way station, which extends to West Street as the North and South Swift stations, are the most active storage locations for liquified oil and other explosive or hazardous chemicals. There are often two trains idling at night and even three trains for shorter periods. The tracks here cross a pipeline and are a very close distant to California and Dakota creeks and Drayton Harbor. I live downhill and downwind from this location and have witnessed some train cars containing hazardous materials left idling for hours, usually later at night. I can hear the trains idling at night and smell the exhaust and hear the trains being moved around. It is unnerving.
- There are idling trains between Grandview and Custer train station that are literally across the street from residential homes, and which produce a very strong diesel exhaust odor that left me feeling ill.
- There is usually a long LP train right before the Portal Way 1-5 exist in Ferndale. Currently, new housing is being built right up to the railroad tracks in this area.

All four of these locations are also very close to 1-5, which is the only way into and out of Bellingham and much of Whatcom County. A large accident and explosion could impact people traveling, and at a minimum affect people's ability to leave the area, or for Canadians to return home.

I understand that you were advised not to regulate train transportation, but I believe that when trains use the train tracks located in our communities as a de facto rail yard, **this is no longer a transportation issue. Instead, it now qualifies as a storage issue**, one that has great health and safety

impacts on local residents in at least 4 areas of the Western County. In the meantime, I see more infrastructure being constructed by BNSF indicating that they intend this to be a permanent situation.

I am unaware of this being an issue in other locations. **Is it possible to check into whether this intensive use of local rail road tracks for short term storage in residential areas is occurring in other locations?** If not, why is it being permitted here? It is a badly kept secret that this is being used by the refineries as a tool to pressure the county into allowing more expansion, a point that the BP spokesperson has made repeatedly..i.e., they need to expand to be competitive. They claim the trains are backed up because they do not have enough storage on site. That sounds like a bad planning decision by private industry that should affect shareholders rather than unlucky county residents who happen to live in the area.

I think it is important for public safety that the storage and handling of hazardous materials on train tracks be prohibited. This is not a properly designed stock yard and does not ensure public safety. Train cars are built for transportation, not for storage. Some chemicals need to be kept at a certain temperature and our unpredictable weather here could make it more of a challenge. And we are all aware that we live in a high seismic risk zone and the trains travel through many tsunami areas. It is only a matter of time before the trains will be impacted along with the residential areas through which they travel and they will complicate what may already be a crisis situation.

Danger from idling trains also occurs under more ordinary, everyday circumstances. Idling trains create air pollution and the noise and light pollution, of which can have serious health impacts to humans, wildlife and water. created by the trains. Vehicle exhaust and wood smoke are the two greatest health risks to county residents, which make these idling trains more than an annoyance. In many instances, they could become life threatening health risks for resident such as myself who have pulmonary disease.

At a minimum, we need to require permanent air quality monitors, paid for by the railroad, at each of its de facto train track locations where trains are left idling for long periods of time. A professional consultant with knowledge of what kind of monitor is necessary and optimal placement should be required to determine how many monitors should be installed

and where. Different monitors measure different things and some need to be placed high and others need to be placed low. When this does not occur, there is great room for both the refineries and NWCAA to manipulate the results to show no impacts, when in fact, harmful air pollution was released.

One final point. I have seen many coal trains in our area, and they are often left idling at the Loomis trail locations, so I recommended that you consider revisions to the County code that cover improper storage on HAZMAT materials as well as coal.

Sincerely,

Wendy Harris