

November 16, 2016

Ms. Amy McBeth
Regional Director Public Affairs
BNSF Railway Company
80 44th Avenue NE
Minneapolis, MN 55421

RE: BNSF Railway's Proposed Automotive Transfer Facility

Dear Ms. McBeth:

The City of Cottage Grove appreciates the opportunity to offer comments on the proposed BNSF Automotive Transfer Facility ("BNSF Project"). The City of Cottage Grove acknowledges there has been effort made by BNSF to discuss potential impacts of the BNSF Project. We are encouraging BNSF to work collaboratively with Cottage Grove, St. Paul Park, Grey Cloud Island Township, and Newport to address issues that might adversely impact residents. While this letter points to certain concerns, the City of Cottage Grove looks forward to continuing to work at bringing clarity and resolution to a range of BNSF Project issues related to impacts upon the communities, residents, and future growth of our region.

The project as outlined in the submittal shows an automotive transfer facility located on approximately 100 acres of a 288-acre parcel located within St. Paul Park immediately adjacent to the City of Cottage Grove border. The project is being constructed to relocate BNSF's operations for St. Paul to St. Paul Park. The project consists of 10 to 11 rail spurs to facilitate the loading and unloading of thousands of vehicles per day and then the transport of those vehicles via semi-truck through the communities until it can reach Highway 61. There will be a substantial parking lot to temporarily hold the vehicles until transport, a small building to support the operation, and other ancillary drive lanes to circulate around the site. There will be additional spur lines constructed along the main rail line at the site.

The City of Cottage Grove understands that the BNSF Project is not anticipating completing a formal environmental review and analysis to determine if there are any negative environmental impacts due to their proposed project. **However, the City of Cottage Grove is requesting that BNSF prepare an Environmental Assessment Worksheet (EAW) for the proposed Automotive Transfer Facility.** The following are areas of concern related to the proposed project that we believe clearly demonstrate that additional environmental review is necessary to ensure our community and adjacent communities are not negatively impacted from this project.

Residential Impacts

The proposed BNSF Project site is in close proximity of residential properties that will be negatively impacted by being located immediately adjacent to the project site and the 10 to 11 rail spur

lines with the loading, unloading, and transport of automobiles. Residential homes and many businesses line the proposed trucking route. The following are concerns that the City of Cottage Grove has regarding the proposed project:

- Change of land use from Agricultural to Heavy Industrial without regard to the City's zoning ordinances or Comprehensive Plan, which completely circumvents the public hearing process.
- Routing significant truck traffic to traverse from the project site to Highway 61 through single-family residential neighborhoods on local streets is not an acceptable solution. Specifically, the proposed truck route through St. Paul Park is on a local street with residential homes that are \$84,000 below the median home value in Washington County. This area is already economically depressed and adding significant truck traffic to an already distressed area further depreciates values and creates worsening livability conditions in this single-family neighborhood.
- There is noise pollution from the coupling and uncoupling of railcars, throttling and idling train engines, train horns, whistles, bells, unloading passenger vehicles from railcars, and loading passenger vehicles onto truck-trailer transit vehicles. These noise disturbances are unpleasant, annoying, offensive, loud, and obnoxious to neighboring single-family property owners. These disturbances are even more offensive during late or early hours of the day and adversely impact the reasonable enjoyment of property.
- Light pollution glare from numerous outdoor lights that causes a sensation of discomfort due to high contrast or non-uniform distribution of light in the field of view.
- Urban sky glow that brightens the night sky due to manmade lighting that passes upward with the light rays reflecting off microscopic dust, water particles in the air, and buildings/ pavement surfaces.

Currently, no mitigation plans have been developed or provided to address these concerns. Residential mitigation efforts should be reviewed to address the increased noise created from the proposed operations. A detailed noise impact study should be performed to analyze project noise exposure.

Site Concerns

The current site plans do not show what is proposed for grading or landscaping of the site. A densely planted, landscaped buffer along roadways adjoining BNSF's proposed automotive transfer facility is encouraged. The existence of a landscaped buffer will help mitigate and screen public views of this facility's outdoor storage, loading and unloading activities, security fence, and contracted tractor-trailer transport vehicles.

In addition, greater setbacks between impervious surfaces, outdoor storage areas, loading and unloading operations, and the property's perimeter boundary line should be considered to lessen some of the noise and light pollution that neighboring residents will experience.

Details have not been provided that show grading of the site or how stormwater management will be handled. The site improvements must incorporate both rate and water quality improvements for stormwater. Additional containment basins should be considered given the close proximity to the Mississippi River and backwater channels of the river to prevent potential contaminate or hazardous waste discharge from the site. The site is directly adjacent to the Mississippi River Critical Corridor Area and the Mississippi National River and Recreational Area, which is a National Park.

Also, further investigation should be done in the review of infiltration practices of stormwater as it relates to groundwater protection, private well protection, and municipal cities' well head protection plans.

There are no provisions that identify what will be stored on site and no plans to screen the exterior storage from adjacent properties or to prevent the accumulation of junk on the site. BNSF has not described or provided a plan for the remaining 188 acres of land that are still available on the site and the future use of the site. The concern is that future development could consist of a flat or hump yard, outdoor storage for railroad equipment and materials, intermodal container transfer facility, railcar service center, and other objectionable railroad uses.

A rezoning application, site plan application, or land use planning approval that provide a public hearing would adequately afford the public due process and allow these issues to be address.

Air Quality Concerns

The increase of diesel exhaust is of great concern. The proposed project will increase the locomotive traffic to the site. New regulations created standards for new locomotives, but there are no regulations for the existing locomotive fleet that still allow high emission rates.

In St. Paul Park, ambient air monitoring has found increased levels of benzene, formaldehyde, and sulfur dioxide according the MPCA air monitoring data. This fact cannot be ignored as concentrated diesel emissions will increase in this area. Also, the fact that black carbon emissions from the site will increase must be reviewed.

Traffic Increase and Truck Routing

The City of Cottage Grove is not going to extend 95th Street, which is a local street, to any roadway system in Grey Cloud Island Township or St. Paul Park for purposes of providing an alternative truck haul route for BNSF. The City of Cottage Grove has systematically planned for the growth of our community, specifically for our residential developments and business park in the area of 95th Street and Jamaica Avenue. Pursuant to that plan, a new 383-lot single-family residential subdivision named Summer's Landing is being developed on the 160-acres of land located north of 95th Street and west of Hadley Avenue. The Mississippi Dunes Estates single-family neighborhood exists on the south side of 95th Street. The westerly extension of this segment of 95th Street will not be constructed simply to allow a truck haul route for BNSF through existing

and developing residential neighborhoods. The City will not compromise our planned developments or our level of service for our businesses and taxpayers or expend city resources just for BNSF, who does not contribute to the City's tax base.

The proposed truck route for the facility passes in front of Oltman Middle School. There are safety concerns related to the increased volume of trucks that could conflict with the school's morning and afternoon drop-off and pick-up times for students creating additional congestion in the area. There are also additional concerns with pedestrians and students that walk to the school as they will now be encountering more truck traffic.

The City of Cottage Grove, City of St. Paul Park, Grey Cloud Island Township, Washington County, and the Minnesota Department of Transportation worked cooperatively in 2008 to develop an east-west arterial roadway to connect Grey Cloud Trail to the CSAH 19 interchange of TH 61. The study outlined the necessary improvements to construct this arterial route to support growth and traffic demand similar to the BNSF proposal. The study identified existing deficiencies with the existing roadway network. The conditions that existed in 2008 are still the same today. The proposed new aerial route from CSAH 19/TH 61, which traversed along 100th Street, from 103rd Street to Grey Cloud Trail, had an estimated construction cost of \$30 million.

The proposal as presented by BNSF does not adequately address the negative impacts, specifically the increased traffic volume, and BNSF has not proposed improvements to any truck route to support their operations. This means that the financial burden will fall to the Cities, the County, and the State to address. This proposal is not acceptable. The negative impacts must be mitigated, and they must be addressed up front prior to development. BNSF must bear the financial burden of the impacts today and be held accountable for future maintenance and any necessary improvements as further growth occurs on the site. Local units of government should not be adversely impacted for railroad expansion and economic gain.

This evidence indicates that, because of the nature and location of the proposed BNSF Project, there may be a potential for significant environmental effects that BNSF Railway Company should seek to address. The City of Cottage Grove is requesting that an EAW be performed to address the concerns about the negative impact of traffic through the various communities, lack of existing infrastructure on County and State Highway interchanges to support the proposed traffic volumes, the increased noise and light levels, proximity to the Mississippi River, and the potential for decreased air quality.

Respectively Submitted,



Mayor Myron Bailey
City of Cottage Grove

Copies to:

Senator Amy Klobuchar
Senator Al Franken
Congressman John Kline
Congressman Elect Jason Lewis
State Senator Katie Sieben
State Representative Denny McNamara
State Representative Dan Schoen
State Representative Elect Tony Jurgens
State Representative Elect Keith Franke
Charles Zelle, MnDOT Commissioner
Tom Landwehr, MnDNR Commissioner
Dr. Edward Ehlinger, MDH Commissioner
John Linc Stine, MnPCA Commissioner
Karla Bigham, Washington County Commissioner
Molly O'Rourke, Washington County Administrator
Wayne Sandberg, Washington County
Harry Melander, Metropolitan Council Member, District 12
Keith Franke, Mayor, City of St. Paul Park
Kevin Walsh, City Administrator, City of St. Paul Park
Tim Geraghty, Mayor, City of Newport
Deb Hill, City Administrator, City of Newport
Township Clerk, Grey Cloud Island Township
Matt Moore, South Washington Watershed District
Will Seuffert, Executive Director, MN Environmental Quality Board
David Johnson, BNSF Railway Company
Brian Sweeney, BNSF Railway Company
Adam Josephson, East Area Metro Manager, Minnesota Department of Transportation
Dr. Keith Jacobus, ISD-833 Superintendent
Charlene Stevens, City Administrator, City of Cottage Grove