

17509 NE 38th Court
Redmond, WA 98052
425-869-8899
ewilson@spiretech.com

20 October 2010

U.S. Surface Transportation Board
Office of Proceedings
395 E Street, S.W.
Washington, DC 20423-0001

Attn: Cynthia Brown, Chief, Section of Administration

Re: GNP Rly, Inc. Petition to vacate NITU or Abandonment

STB Docket AB-6 (Sub 463X and 465X; BNSF Railway Abandonment Exemption in King Co., WA)

To The Board:

As a citizen of Redmond, Washington, I am writing to express my unequivocal support of the referenced GNP Rly, Inc. "Petition to Vacate Notice of Interim Trail Use or Abandonment". I am very much in favor of immediate reactivation of the so-called 'Redmond Spur' rail line, along with the related and connected portion of the "Woodinville Subdivision" rail line, all as described in the referenced petition. I urge the Board to approve the GNP Rly Petition. My comments are presented below. I am leaving the intricacies and application of relevant federal law to GNP and STB to work out.

At present, the former BNSF Issaquah Branch (aka Redmond Spur) line is inactive. However, the roadbed and rail are still intact all the way from Woodinville south through downtown Redmond to its intersection with Washington highway SR 520 on the easterly side of Redmond. This remaining rail line provides the opportunity for Redmond and the adjacent unincorporated area to once again be connected to the national rail system. The potential economic and environmental benefit from this connection is nearly incalculable. On the other hand, the value of the alternative use, i.e., additional trails within Redmond, is minimal. Nonetheless, shared use of some of the right-of-way may be feasible. I see three major potential benefits to reactivation of this rail line.

First, GNP Rly has already secured shipping commitments from several businesses along the subject rail line, as documented in the referenced docket file. There are numerous other businesses, e.g., lumber yards, roofing supply house, manufacturers, food processors, etc., in this corridor that are potential freight shippers over a reactivated rail line. It is significant that the industrial subdivisions in the northwesterly quadrant of Redmond, through which the 'Redmond Spur' passes, were designed with rail access as an integral feature. There are two east-west 'rail easements' in the recorded plats; each easement branches off of the main spur line. The southerly easement was already partially developed to serve "Building Specialties", which is one of the businesses that has requested the resumption of rail service to this area. The local power company, Puget Sound Energy, has a substation along the spur, also. They stand to benefit from the possibility of having over-sized equipment, e.g., transformers, delivered to them by rail. These are merely a few of the possible freight benefits of restoring rail service along this spur line.

The second category of business that this reactivated rail line would make possible is tourist excursions, which would be a new economic activity for Redmond. It is well known that the corridor served by the Redmond Spur is home to over 40 wineries, one craft brewery and at least one distillery, along with other attractions. These businesses are enormously popular with area visitors, and could be very well served by specialty passenger trains running between Redmond and Snohomish, not to mention dinner trains. The fact that the subject rail line terminates right in

downtown Redmond and Snohomish, and passes through downtown Woodinville makes it ideally suited to such a tourist operation, which GNP Rly has indicated it would eventually like to operate or facilitate.

Finally, reactivating and rehabilitating the Redmond Spur opens the possibility of easily establishing commuter rail service between Redmond and Snohomish (and beyond). The large employment base in Redmond could benefit from such a service running in and out of downtown, which is also the chosen future terminus of Sound Transit's 'East Link' light rail line. In the meantime, Microsoft's 'Connector' bus service could take commuters from downtown to the various Microsoft offices in the city. This would greatly expand the practical housing area for local business employees, while reducing individual car trips. Self-propelled rail cars could be used on this spur line for relatively low start-up cost. Likewise, the immediate cost and impact of additional infrastructure, e.g., loading platforms and parking, to support such a commuter service would be minimal.

In spite of these potential benefits, the City of Redmond, joined by other cities and government entities along the former 'Woodinville Subdivision', wrote to the Board on 13 September 2010 to express certain concerns they had with the subject petitions, and requesting that the STB provide more notice and a more formal review process. While they stated that this letter was not "a substantive response to GNP's petitions", they do not yet appear to have submitted such a formal response. Therefore, I can only address some of the initial concerns stated in their letter.

First, I find it absurd that the City of Redmond has chosen to include the Cities of Bellevue and Renton in their letter requesting a more deliberative process and "full review" of the petitions. Their statement that these two cities "...would be directly and indirectly impacted by the granting of the subject petitions" is simply not true. The only portion of the Woodinville Subdivision (which does pass through Bellevue and Renton) involved in the current petition is a short section south of Woodinville. This 1.8 mile section of the old line does not even enter Kirkland, let alone the other two cities. The only government entities affected by these petitions are Redmond, King County and Woodinville.

Second, Redmond's interest in addressing "potential environmental impacts" is spurious at best. The branch rail line in question has been in existence for well over 100 years! While the track itself is in need of maintenance and repair, it is my understanding that there is a categorical exemption from environmental review for this sort of work. This makes sense, as maintenance-of-way work was conducted by the railroads throughout the period of the line's active use. If anything, there will be a positive environmental impact from reactivating rail service due to reduced truck traffic and emissions.

Third, Redmond argues that there are "significant and valuable public uses" being planned for the Woodinville Subdivision corridor (Woodinville to Renton), and implies that this is also the case for the Redmond Spur. There is no evidence that this is true. Redmond already enjoys a nearby regional trail along the Sammamish River, which roughly parallels the Redmond spur. So it is hard to see how there could be much "...monetary value of lost benefit to the public of precluding a regional trail along this alignment..." To date, neither Redmond nor King County have done anything but talk about possible uses of the rail corridors they acquired from BNSF Railway. GNP Rly, on the other hand, now appears ready to reactivate rail service as soon as all of the necessary approvals have been secured. GNP should be permitted, in fact *encouraged*, to do so. Their new business will be a welcome addition to the regional economy in the current downturn.

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20 Oct. 2010

While there are other points that I could make at this time, I close with the observation that the final paragraph of the referenced Cities letter seems to best show their true intent. They seek to complicate and delay GNP's proposed rail service reactivation for no apparent reason other than to impose their own notions of convoluted public process. GNP Rly's petition and proposal is straight-forward and positive. It does not involve significant construction nor any other impact to public interests in the vicinity. The City of Redmond and their co-signers fail to make a case why these petitions are deserving of "a full review", including "environmental review, consideration of local and regional impacts..." nor do they adequately explain why there should be any *extraordinary* opportunity for comment by the public or governmental entities. It is just this sort of endless public process and consensus building exercise that has put the Puget Sound region 25 years behind the Portland, Oregon Metro area in implementing light rail. I urge the Board to simply proceed with its evaluation of GNP Rly's petitions and proposal using your normal review procedures and time lines. I am confident that Redmond, Woodinville and King County will ultimately benefit from having their national rail system connection restored by GNP.

By this letter of comments, I also respectfully notify STB that I would like to be a party of record for the purpose of tracking and further commenting on the subject proceedings. Please keep me informed of the progress of your review, and of any local hearings that may be scheduled.

Thank you for the opportunity to comment on these petitions now before the Board.

Sincerely,

Ernest F. Wilson, PLS

copy: John Marchione, Mayor of Redmond
Redmond City Council
Chuck Price, Mayor of Woodinville
Hon. Dow Constantine, King County Executive
Hon. Jay Inslee, US Congressional Representative



Docket FD 35407 Certificate of Service

ewilson to: barbara.saddler

10/22/2010 02:46 PM

Ms. Saddler-

This e-mail is to certify that I have today served copies of my letter of 20 Oct. 2010 to the U.S Surface Transportation Board regarding the above Lead Case, which incorporates STB Dockets AB-6, Sub 463X and Sub 465X, upon the five parties originally listed in that letter. In addition, I have served copies upon the two attorneys you specified in yesterday's e-mail to me, namely John Heffner and Charles Spitulnik.

The copies were delivered in person by me to the offices of John Marchione (Mayor of Redmond, Washington), the Redmond City Council, and Chuck Price (Mayor of Woodinville, Washington). Copies were delivered by U.S. Mail to Dow Constantine (King County Executive), Jay Inslee (U.S. Representative, 1st Congressional District of Washington), and the above-named John Heffner and Charles Spitulnik. Copies of the envelopes used for the mailings are available if needed.

I believe, based on our phone conversation yesterday, that this e-mail certification of service will suffice for the referenced letter of comments. Please advise me if there is anything else that you need to complete the process of listing me as a party of record in this proceeding.

Sincerely,

Ernest F. Wilson
425-869-8899