



November 23, 2016

Millennium Bulk Terminals – Longview NEPA DEIS
c/o ICF International
710 Second Avenue Suite 550
Seattle, WA 98104

RE: NEPA Draft Environmental Impact Statement (DEIS) on Millennium Bulk Terminals – Longview Comments

Ms. Danette L. Guy:

Thank you for providing the Washington State Department of Transportation (WSDOT) with this opportunity to comment on the National Environmental Policy Act (NEPA) Millennium Bulk Terminals – Longview (Millennium) Draft Environmental Impact Statement (DEIS). WSDOT's responsibility to Washington's citizens is to provide a safe and efficient transportation system that supports our economy, communities, and the environment. It is therefore essential for the agency to ensure that proposed actions that can adversely impact this mission are carefully assessed to identify conflicts and necessary mitigation strategies.

WSDOT's comments will focus on potential impacts to state highway and rail operations. Two alternative sites have been proposed in the NEPA DEIS; because the impact on state facilities is the same for both sites, they will be discussed together.

Currently, all of the subject railroad grade crossings operate at a level of service of A or B. Numerous rail crossings will experience a level of service lower than D with the operation of this development. This will not only impact the grade crossings, but will have a queuing impact on nearby intersections. Numerous intersection movements are shown to exceed available storage, and two are termed "adverse queuing impact." WSDOT believes that the proposed transportation mitigation measures are inadequate and requests that the applicant provide adequate mitigation measures to ensure that none of the subject grade crossings will operate at level of service lower than D, and that queuing impact to intersections is addressed. This needs to be supported by a traffic study to verify that these goals will be met.

Additional discussion regarding delay to emergency vehicles is necessary. The EIS should disclose that the Oregon Way crossing is the only practical route between Rainier and other Oregon communities and medical facilities in Longview. Also, multiple access points to the Weyerhaeuser mill could easily be blocked at the same time by the same train. The applicant should discuss how emergency service response time and access can be mitigated. Furthermore, pedestrian and bicycle safety at highway intersections impacted by increased vehicle delay needs to be analyzed and mitigation discussed.

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Chapter 6.3 states an accident threshold of 0.04 accidents per year. We are not aware of any established or generally accepted threshold of 0.04 using the USDOT Accident Prediction Model to determine what is and isn't an adverse safety impact. The EIS should clearly specify the basis for this 0.04 threshold.

Given our concerns, WSDOT believes that the proposed mitigation measures in Section 8.3.1 are inadequate. WSDOT requests additional mitigation measures, supported by traffic studies, be added to the EIS.

WSDOT understands the US Army Corps of Engineers scoped this NEPA DEIS differently than Ecology for the state's SEPA DEIS for Millennium. However, in terms of traffic and infrastructure impacts caused by the proposal, the cumulative effects of this project may be greater than what is stated in this NEPA DEIS. WSDOT believes further discussion regarding these impacts should be added to your analysis.

Please see additional specific comments attached. We look forward to working with the Army Corps of Engineers on addressing our comments in the Final EIS. Please contact me at (360) 705-7480 if you have any questions or would like to discuss any of these comments.

Sincerely,



Megan White, P.E., Director
Environmental Services Office

MW:vb

Attachment: WSDOT comments

Attachment

WSDOT Comments on the NEPA Millennium Bulk Terminals-Longview Draft EIS

Two alternative sites have been proposed per Chapter 3 and Section 6.1.4.1 of the Draft NEPA Environmental Impact Statement (DEIS). The On-Site Alternative is located on the applicant's lease area, at the location of the former Reynolds Aluminum plant. The Off-Site Alternative is located west and downstream of the On-Site Alternative on land owned by the Port of Longview. The impact on state facilities is the same for both sites, so they will be discussed together.

Although trains serving this development would pass a number of grade crossings over or adjacent to state highways between the Idaho border and the Millennium site, this document focuses on the area between Longview Junction, where the trains will enter/exit the BNSF mainline, and the project site per Section 6.1.2. This is also the area of primary concern to WSDOT. Trains at the following grade crossings would impact WSDOT facilities:

1. SR 432 (3rd Ave.), SRMP 7.19.
2. California Way, 460 feet north of SR 432, SRMP 7.19.
3. Oregon Way, 300 feet north of SR 432, SRMP 6.10
4. SR 432 (Industrial Way,) SRMP 5.90
5. Weyerhaeuser access (private crossing), adjacent to SR 432, SRMP 4.76
6. Weyerhaeuser access (private crossing), adjacent to SR 432, SRMP 4.43 (opposite Washington Way)
7. Weyerhaeuser access (private crossing), adjacent to SR 432, SRMP 3.88 (opposite Hoehne Ave.)
8. Millennium access (private crossing), adjacent to SR 432, SRMP 3.30 (opposite 38th Ave.)

Per Section 6.1.5.1 of the DEIS, there would be 8 trains in and 8 trains out per day at full build out. These trains will be 125 cars long with 3 locomotive units, and 6,844 feet (1.3 miles) long, according to Table 6.1-2 of the DEIS. According to Section 6.1.4.2, the Reynolds Lead portion, west of the Longview Switching Railroad (LVSW) yard, currently sees 2-3 trains per day, averaging 21 cars (1,450 feet long), less than ¼ the length of the proposed coal trains. According to Section 6.1.4.2 of the DEIS, the current speed limit is 10 MPH. Per Section 6.1.5.1 of the DEIS, this could increase to 25 MPH if track improvements are made by the LSVW. These improvements would include Centralized Traffic Control (CTC) that would allow closer spacing of trains. The railroad proposes to make these improvements if and when they determine they are warranted. However, these improvements are not certain, as noted on Page 6.1-8 of the DEIS.

Table 6.1-3 provides estimated crossing times with existing infrastructure and with possible operating improvements. Below are the public road crossings at or near state highways. It is worth noting that the private crossings adjacent to SR 432 aren't analyzed.

	3rd Ave.	California Way	Oregon Way	Industrial Way
Current Track Infrastructure				
Estimated speed	8 mph	8 mph	10 mph	10 mph
Estimated passing time	10 minutes	10 minutes	8 minutes	8 minutes
Planned Track Infrastructure				
Estimated speed	15 mph	15 mph	20 mph	20 mph
Estimated passing time	5 minutes	5 minutes	4 minutes	4 minutes

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According to WSDOT level of service standards (2010), level of service D or better is acceptable for urban highways. Currently, all crossings of concern to WSDOT have a level of service of B or better, per Table 6.3-5. This table shows that if rail is used for delivery of construction materials, the Project Access at 38th Ave. will have a peak hour level of service of F, and the crossings at California Way and 3rd Ave. will have a level of service E during construction of the facility in 2018. Below is the estimated peak hour level of service at the grade crossings of concern to WSDOT in 2028, when the facility is operating, taken from Table 6.3-9. Locations of level of service worse than D are highlighted:

Crossing	No-Action	Current Track Infrastructure 1 Peak Hour Train	Planned Track Infrastructure 1 Peak Hour Train	Planned Track Infrastructure 2 Peak Hour Trains
Project Area Access at 38 th Avenue	B	F	F	F
Weyerhaeuser Access at Washington Way	A	E	D	E
Weyerhaeuser NORPAC Access	A	D	B	C
Industrial Way (SR 432)	A	E	B	C
Oregon Way (SR 433)	A	E	C	C
California Way	A	E	C	D
3 rd Ave. (SR 432)	B	F	C	E

Another area of concern is queuing. Increased vehicle delay from trains blocking at-grade crossings can affect nearby intersections. As vehicles begin to queue while waiting for the crossing to open, increased roadway congestion can affect upstream intersections. Queue lengths would be highest during the peak hour if a project related train travels through the study crossings during the peak hour. Table 6.3-10 shows the estimated peak hour queue lengths in the year 2028 at various grade crossings. Numerous intersection movements are shown to exceed available storage, and two are termed “adverse queuing impact”.

Chapter 6.3, the “Vehicle Safety” Section under “Railroad Crossing Performance Measures” (bottom of p. 6.3-10) states:

“Based on other applications of the model, an adverse vehicle safety impact was defined as a study crossing with a predicted accident probability above 0.04 accident per year with the proposed export terminal that would be at or below 0.04 accident per year under the No-Action scenario.”

We are not aware of any established or generally accepted threshold of 0.04 using the USDOT Accident Prediction Model to determine what is and isn’t an adverse safety impact. The only “other applications of the model” where we have seen this is within the SEPA documents for the same project, where we had the same comment/question. The DEIS should clearly specify the basis for this 0.04 threshold.

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It is noted on Pages 6.3-23 and 6.3-27 that emergency vehicles would experience the same delays as all vehicles.

The applicant's proposed traffic mitigation measures are listed in Section 8.3.1 of the DEIS. They are:

- Fund the extension of the left-turn lane from Washington Way to Industrial Way.
- Fund the installation of crossing gates at the Reynolds Lead grade crossing of Industrial Way (SR 432).
- The applicant could also notify various agencies 6 months before the start of operation so they would have advanced warning of the increase in rail traffic.
- LVSW could implement the track improvements described above.
- The Industrial Way/Oregon Way Intersection Project could continue to develop a preferred alternative to reduce vehicle delay and improve safety at that intersection.

It should be noted that several studies have been done investigating the Industrial Way/Oregon Way intersection, and Cowlitz County is the lead agency on another study currently underway. A grade-separated intersection, including grade-separated railroad crossings is an alternative being studied. In 2015, the Washington State Legislature passed the Connecting Washington transportation funding package, which included \$85 million to be used for improvements to this intersection between 2017 and 2025.

Based on the above discussion, WSDOT has the following concerns:

- Currently, all of the subject railroad grade crossings operate at a level of service of A or B. Numerous rail crossings will experience a level of service lower than D with the operation of this development. This will not only impact the grade crossings, but will have a queuing impact on nearby intersections. WSDOT believes that the proposed transportation mitigation measures are inadequate. WSDOT requests that the applicant provide adequate mitigation measures to ensure that none of the subject grade crossings will operate at level of service lower than D, and that queuing impact to intersections is addressed. This needs to be supported by a traffic study to verify that these goals will be met. Private crossings adjacent to SR 432 should be included in the analysis.
- Additional discussion regarding delay to emergency vehicles is necessary. The Final EIS (FEIS) should disclose that the Oregon Way crossing is the only practical route between Rainier and other Oregon communities and medical facilities in Longview. Also, multiple accesses to the Weyerhaeuser mill could easily be blocked at the same time by the same train. The applicant should discuss how emergency service response time and access can be mitigated.
- Pedestrian and bicycle safety at highway intersections impacted by increased vehicle delay needs to be analyzed, and mitigation discussed in the FEIS.
- The FEIS should clearly specify the basis for the 0.04 accident threshold.
- Given our concerns identified above, WSDOT believes that the proposed mitigation measures in Section 8.3.1 are inadequate. Therefore, WSDOT requests additional mitigation measures supported by traffic studies as discussed above.

