November 28, 2016

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

Re: Formal Comments on USACE Draft NEPA Environmental Impact Statement for Millennium Bulk Terminal (MBT) proposed coal terminal project

According to the MBT Draft SEPA, April 29, 2016, the current BNSF Spur and Reynolds Lead does not have the capacity to handle the additional 16 trains per day of the proposed coal terminal project. It states, "*Existing rail traffic on the BNSF Spur is about 7 trains per day. Capacity is about 16 trains per day, which supports the current volume (Cambridge Systematics 2007).*" 5.1.4.2

Additionally on page 5.6-16, *"Without improvements to increase capacity, neither the Reynolds Lead nor BNSF Spur would have the capacity to handle baseline rail traffic and Proposed Action-related rail traffic. Without improvements to the Reynolds Lead and BNSF Spur, the Proposed Action would result in a significant adverse impact on rail traffic on the Reynolds Lead and BNSF Spur."*

This contradicts the USACE Draft NEPA EIS, which states, "*Capacity of the Reynolds Lead and BNSF Spur is approximately 24 trains per day. The baseline volume is an average of 7 trains per day on the BNSF Spur and 4 trains per day on the Reynolds Lead. Project-related trains would add 16 trains per day (8 loaded and 8 empty) on each of these segments for a total of 23 trains on the BNSF Spur and 20 trains on the Reynolds Lead. The Reynolds Lead and BNSF Spur have the capacity to handle current baseline rail traffic plus future project-related rail traffic."* 6.1-8

There has been no commitment by LVSW or BNSF to improve the Lead or Spur. No work has been permitted or started. Because of this significant adverse impact on existing rail traffic I recommend the No Action Alternative.

From the BNSF Cowlitz Rail Bridge on the Spur to the Proposed Action is about 6 miles. From the Bridge to the Reynolds Lead is about 1.5 miles. The unit trains are about 1.3 miles long. The 10 mph speed limit on the single track Cowlitz River Bridge will not change with planned track improvements. There are 5 public at grade crossings and 2 private crossings.

Table 6.1-3 provides at grade crossing times at several intersections for project-related trains with current infrastructure and with planned track improvements. Most of the route from the Cowlitz River Rail Bridge will involve unit trains blocking at least one at grade crossing and up to 4 crossings at one time.

When the unit train enters the Project Area the last car will still be passing the last private crossing.
Estimated speed and crossing times are not determined for the private crossings. These need to be considered.

The SEPA DEIS does not state at what point the unit train will be slowing to enter the Project Area. However on 6.3-11 the NEPA Table 6.3-3 shows average speed of trains at project area access at 38th Avenue is currently 5 mph. At this point there are no planned track improvements to increase train speed. A train, even at 10 mph, cannot stop on a dime and will need to slow on entering the Project Area. Presumably the front of the train will travel at the same speed as the end of the train. **What will be the speed of the last car when the front of the train enters the Project Area? At what point along the route will the last car be located when the train enters the Project Area?**

Conversely, at the beginning of the Reynolds Lead the train needs to stop while a switch is changed to move the train from the Spur to the Lead. "*The electronic switch would eliminate the need for project-related trains to stop while a train crew member operates the switch."* 6.1-8

While the train is stopped at this switch it appears to be blocking the 1st public crossing when the train is moving east to west toward the Project Area. Again, 1.3 mile loaded coal unit trains do not start on a dime. **So what is the actual passing time at the Dike Road crossing to allow for a coal unit train to stop while the switch is changed and then to actually start and move again? What is the track distance required for the train to reach any of the suggested route speeds from a standstill?**

Even if the switch is upgraded, what will be the speed limit through the switch from the Spur to the Lead? The speed through the Spur to Lead switch has relevance to the speed and passing times through the following heavily travelled at grade crossings. As the train enters the 3rd crossing at California Way, half of the train will still be moving through the switch and still blocking the 2nd crossing at 3rd Avenue.

With current track infrastructure, the NEPA DEIS gives the 3rd Avenue and California Way crossings the slowest speed limits of 8 mph, and the 4th and 5th crossings, Oregon and Industrial Way, increasing to 10 mph. **However because the back of the train will still be moving through the slower crossings at the same time they have entered the Oregon and Industrial Way crossings, the increased speed limits for the 4th and 5th crossings would not be achievable.**

Passing times should be based on the speed limit of the slowest crossing when multiple crossings are affected at one time.

In short, the speed limits and passing times for at grade crossings in Table 6.1-3 are incomplete, simplistic, and unrealistic because they fail to take into account the private crossings and the Spur/Lead switch, and the distance and time it takes to move or stop a 1.3 mile coal unit train. This last factor is also variable due to weather, track conditions, and train equipment.

Accurate passing times at major intersections are critical to understanding adverse impacts on road traffic and congestion. Besides obvious safety issues from increased rail traffic and crossing blockages, there is the adverse impact on current business activity. As noted on 4.2-26, *"The previous section describes how project–related trains would affect vehicle delay at at-grade crossings on the Reynolds Lead and BNSF Spur. This vehicle delay could affect accessibility to local businesses during the peak traffic hour without track infrastructure improvements to the Reynolds Lead and BNSF Spur, or if two project-related trains travel during the peak traffic hour."*

If economic benefits are to be considered in decisions on this project, then negative economic consequences should also be quantified and presented.

I also object to the rail operations described as "Indirect Impacts." Rail operations are an integral part of the Proposed Action without which the project fails. The rail impacts are Direct.

Required rail operations present significant adverse impacts to rail traffic, road traffic, resident and business activities. I recommend the No Action Alternative.

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