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November 29, 2016

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

RE: Comments on Millennium Bulk Terminals Draft NEPA Environmental Impact Statement

The City of Longview is a public agency serving a community potentially impacted by this project. City staff have completed a technical review of the Draft NEPA Environmental Impact Statement (DEIS), and I am submitting the following comments and recommendations as a result of that staff review.

#### Rail Transportation

The DEIS describes 16 unit trains traveling to and from Millennium Bulk Terminals (MBT) on a daily basis. The trains are identified as 1.3 miles long travelling at 10 mph. This means the trains will block more than one roadway crossing at a time in Longview on the Reynolds Lead: combinations of Industrial Way, Oregon Way, California Way, and/or 3<sup>rd</sup> Avenue. The impacts are described in broad general terms and do not address the cumulative impacts of having more than one intersection disrupted by unit trains, potentially more than once per hour during peak vehicle hours.

Table 6.1-3, BNSF Spur and Reynolds Lead At-Grade Crossing Detail for Project Related Trains, shows train speeds with proposed track improvement from 10 to 20 mph, and Page 6.1-8 indicates speeds up to 25 mph may be attained after upgrades. Page 6.1-8 also indicates the Cowlitz River Bridge limits rail speed to 10 mph on the BNSF Spur. It seems unlikely that trains passing through the Longview switch yard to MBT will accelerate to 20 mph or 25 mph on the Reynolds Lead due to the Cowlitz River Bridge speed limit at one end, and the need to move slowly into the MBT site at the other end. The applicant should provide rail operations modeling or other data supporting the assertion that trains speeds will increase to 20 mph at the roadway crossings on the Reynolds Lead.

In addition, proposed rail improvements that would allow speed increases will be controlled by Longview Switching and BNSF based on rail transport market conditions and rail capacity issues, not as mitigation for impacts to roadway crossings. Increases in train speed should not be considered mitigation unless they are identified as a proposed part of the MBT project.

### Vehicle Transportation

We do not agree that Synchro/SimTraffic software is an appropriate analytic tool to develop vehicle HCM Level of Service measures and queuing at railroad crossings. That software is intended to model standard traffic signalized and unsignalized intersections. We would have expected the analysis to use software recognized to model the interaction of rail and vehicle traffic. The results were presented qualitatively for comparison between Action and No Action alternatives. As a result, the findings only have value relative to each other based on the modeling assumptions, and are not of value when trying to determine the probable impacts.

Further, the vehicle impacts analysis from rail activity is too general, does not seem to incorporate the latest corridor vehicle and train analysis information, and provides an optimistic prediction of potential impacts. The analysis does not adequately analyze the impacts of multiple unit train trips during the peak roadway vehicle hour. Analysis for the Industrial Way/Oregon Way (IWOW) intersection project determined the corridor does not have typical defined morning, mid-day, and evening peaks, with notably reduced volumes between peaks. On the contrary, traffic volumes rise for the morning peak and stay high generally throughout the day, with minor fluctuations. With these prolonged high volumes, a unit train will cause significant queuing at a crossing that will not clear before the next train blocks the same crossing. And the rail discussion states the unit trains cannot be scheduled in advance or scheduled around peak roadway vehicle hours; the trains are scheduled based on the railroad's needs and short term capacities. Historically, manifest trains have travelled the Reynolds Lead during peak roadway vehicle hours, indicating it is highly likely MBT unit trains will also travel during peak roadway vehicle hours, causing significant disruptions to vehicular traffic.

Additionally, the DEIS relies on the Industrial Way/Oregon Way intersection project improvements as mitigation for MBT's increased project rail traffic impacts on roadway vehicle traffic. A preferred intersection option has not yet been identified nor completed a NEPA review, and the costs of the final improvements have not been determined, but the applicant should be required to pay its fair share of the intersection improvements eventually selected, i.e., a financial amount based on its rail traffic.

Other than the mitigation proposed in Section 8.3.1 requiring six months advance notice of increased rail traffic, no proposed mitigation actions were identified to address potential delays in emergency services responses. The applicant should be required to work with BNSF and Longview Switching to provide train crossing indications remotely to police, fire, and ambulance

services. The information should indicate the crossing or crossings blocked and the direction trains are travelling, so responders can choose an appropriate route to avoid delays.

### Noise and Vibration

The DEIS concludes increased rail traffic will have an adverse impact on the environmental justice community in the Highlands Neighborhood, but no specific mitigations are committed – only a series of studies and applications. The applicant should commit to upgrading roadway crossings to create approved quiet zones as mitigation, unless the FRA does not approve the zones. Studies themselves will do nothing to mitigate the noise impacts on the Highlands Neighborhood

### Natural Environment – Groundwater

Page 5.4-6 incorrectly states the Mint Farm Regional Water Treatment Plant provides water to the Cowlitz County PUD – in actuality it provides water to the Beacon Hill Water and Sewer District. Additionally, the DEIS states that while the direct impacts study area does not extend to the Mint Farm Regional Water Treatment Plant, the *indirect* impacts study area includes the treatment plant, and both the direct and indirect impacts study areas include the treatment plant's wellhead protection area. That statement is true, but we recommend clarifying that the wellhead protection area extends into the direct impacts study area because the Columbia River recharge of the deep aquifer flows under the MBT project site according to the hydrogeological investigations performed for the Mint Farm Regional Water Treatment Plant.

While we have no reason to believe the proposed project will adversely impact the deeper aquifer supplying the City's Mint Farm Regional Water Treatment Plant, because the aquifer recharge from the Columbia River does flow under the MBT site, the applicant should mitigate any concerns by allowing the City to test the applicant's active groundwater wells twice annually during the City's wellhead protection program sampling of sentry wells.

### Recommendations

In conclusion, the information presented in the DEIS is too general and too broad to support decisions on what rail, vehicle, and noise mitigations are necessary to address the MBT project impacts. We recommend the following revisions to the DEIS:

1. Analyze train speeds based on the constraints of the existing rail system unless track improvements are proposed as mitigation.
2. Model the impacts to vehicular transportation using a microscopic simulation package such as Vissim to determine queuing lengths and durations. Model conditions for one and two unit train scenarios during a peak hour.
3. Analyze the impacts to existing businesses such as Pacific Fibre and Simpson Lumber. It appears that impacts to such entities from queuing are understated.

4. MBT should commit to financially supporting the improvements proposed by the IWOW intersection project or other improvements identified in the SR 432 corridor study prepared by CWCOG and WSDOT.
5. The applicant should be required to work with BNSF and Longview Switching to provide train crossing indications remotely to police, fire, and ambulance services. The information should indicate the crossing or crossings blocked and the direction a train is travelling, so responders can choose an appropriate route to avoid delays.
6. Commit to completing quiet zone upgrades and/or other tangible noise mitigation actions beyond simply studying options.
7. Commit to cooperating with the City of Longview to allow groundwater sampling from active MBT wells during the City's wellhead protection program twice per year sampling events.

Thank you for the opportunity to comment.

Sincerely,



David M. Campbell  
City Manager

cc: Mayor and City Council