



CITIZENS FOR SENSIBLE TRANSPORTATION PLANNING

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I am the President of **Citizens for Sensible Transportation Planning**, a 501(c)(3) non-profit and submit the following comments on behalf of my organization regarding the Millennium Bulk Terminals-Longview SEPA Draft Environmental Impact Statement.

The Draft EIS identifies numerous unavoidable and significant adverse environmental impacts that will remain for nine environmental resource areas: social and community resources; cultural resources; tribal resources; rail transportation; rail safety; vehicle transportation; vessel transportation; noise and vibration; and greenhouse gas emissions. Significant impacts from just one of these resource areas should be enough to derail this permit process. Identifying nine separate areas that will have unavoidable adverse impacts is a mandate to stop this dangerous project from moving forward.

In the Summary document, on page S-42, under the section labeled S.7.6 the document discusses how the Proposed Action will have unavoidable and significant adverse impacts on vehicle transportation in Cowlitz County. This section needs to be expanded to document that adverse conditions will also develop in Spokane County as we have at least 25 at grade crossings which will experience the same volume of trains moving through Spokane as will move through Cowlitz County on tracks that section S.7.4 on page S-41 has identified as not having capacity to handle the increased rail traffic and will experience unavoidable and significant adverse impacts.

Vehicle Transportation, 6.3.3.3, discusses potential cumulative impacts on vehicle transportation. A detailed, quantitative, analysis was conducted in the Cowlitz County area, but only a qualitative, cursory analysis was conducted for Spokane County. Even though train volume is going to go from the current 70 trains a day to a projected 200 trains per day in 2038 (see below) in the Spokane Corridor. This near tripling of train volume will create significant additional vehicle delay at these at grade crossings without accounting for increases in vehicle congestion that is going to occur on these roads during the next 20 years. In Spokane County, on just the BNSF rail line to Pasco, there are 25 "at Grade" crossings. The average daily traffic

count for these roads is currently more than 51,000 cars per day. A significant portion of this traffic volume will be subjected to increased congestion for so many minutes per day as the additional train volume traverses the county. Over the course of a year, this will cost Spokane County drivers millions of dollars in increased congestion costs. The increase in traffic congestion created by the additional trains being added to the existing rail network needs to be identified and properly mitigated. Transportation projects under construction in just Spokane County are spending billions of dollars to add capacity to the transportation road grid and these coal trains are going to increase traffic congestion on dozens of arterials that cross rail lines at the "at Grade" crossings. The deis needs to do a quantitative analysis of these traffic impacts for the Spokane area.

On the Idaho/Washington stateline to Spokane BNSF line segment, current daily track volume is 70 trains per day and capacity is 76 trains per day. The tracks are basically at capacity without the addition of extra coal trains for the MBT project nor the unit oil trains for the Tesoro Oil terminal in Vancouver. Adding all of this proposed additional rail traffic will exacerbate the rail capacity problem to an unsafe level. On the Spokane to Pasco rail segment, current volume is 39 trains per day and capacity is 37 trains per day. The line is already beyond capacity without the MBT and Tesoro project volumes. Table 6-6 on page 6-37 estimates rail traffic volume for the year 2038 in Spokane will be 184 trains per day without the MBT and 200 trains per day with the MBT! All of this rail traffic funneling through a corridor with a capacity of 76 trains per day. A ludicrous proposition. Rail traffic through the Spokane Valley will basically triple compared to current conditions if all of the projected rail volume develops over the next 20 years, driven by the multiple proposals for export terminals to move fossil fuels halfway around the planet.

An article in the journal Atmospheric Pollution Research in May of 2014 presented the results of their study to evaluate the air quality implications of rail traffic. The results show that living close to the rail lines significantly increases PM2.5 exposure (see Figure 3). As rail traffic increases, residents close to the rail lines will see their air quality decline. Why don't the results in the deis reach similar conclusions for their PM2.5 analysis as the research presented in the journal article?

The deis did an analysis of Estimated Maximum and Average Monthly Coal Dust Deposition in both Cowlitz County (Table 5.7-7) and in Washington state outside of Cowlitz County (Table 5.7-10). The analysis shows that at a distance of 100 feet, the maximum monthly deposition exceeds the trigger level for sensitive receptors inside Cowlitz County but doesn't outside of Cowlitz County. This doesn't make sense. The same trains travel over the same range of speeds throughout the entire state. How did the analyses produce different results? The discrepancy needs to be explained.

Mitigation measures proposed to alleviate impacts can't be speculative and unenforceable. They must be relevant and actually resolve the problem. Creating a reporting process (MM CDUST-2) so people can report coal dust complaints doesn't mitigate for the coal dust impairment. Applying surfactant in Pasco (MM CDUST-3) doesn't solve a coal dust problem in Spokane. Attending one meeting a year (MM CDUST-4) to discuss concerns doesn't solve coal dust impairment. Telling BNSF that they should conduct a dust monitoring study (5.7.7.3) when they aren't the entity receiving the permits in the deis is unenforceable.

The unavoidable, adverse environmental impacts that can't be mitigated make it imperative that permits needed to construct this export terminal project must be denied and the proposed action must never be allowed to be constructed. This project is not good for the greater Longview community, the entire rail corridor through Washington state (including the Spokane area where CSTP is located), the entire rail corridor beyond the state border, and ultimately the world community which would annually see 3.2 million metric tons of CO₂e emissions added to atmosphere (Table 5.8-8). This would be occurring during the timeframe when 195 countries agreed to work towards reducing greenhouse gas emissions at the Paris Accord.

Atmospheric Pollution Research

www.atmospollres.com



Diesel particulate matter emission factors and air quality implications from in-service rail in Washington State, USA

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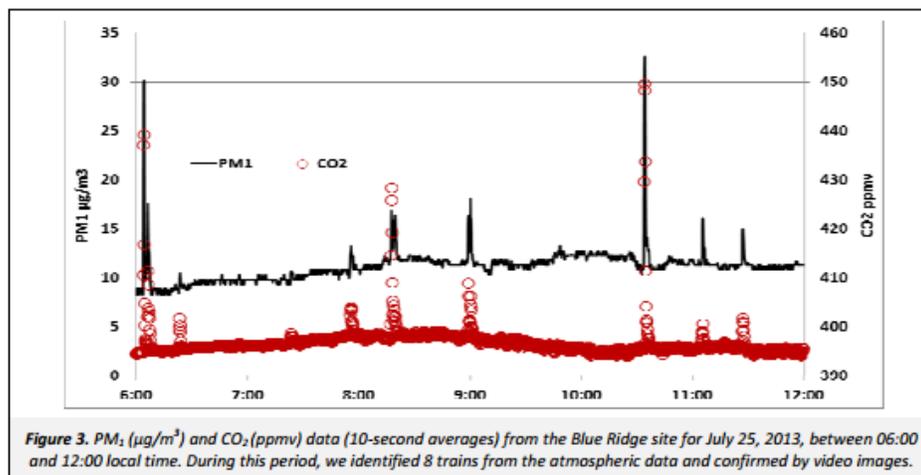
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“Our measurements of PM_{2.5} show that living close to the rail lines significantly increases PM_{2.5} exposure. For the one month of measurements at the Seattle site, the average PM_{2.5} concentration was 6.8 $\mu\text{g}/\text{m}^3$ higher near the rail lines compared to the average from several background locations. Because the excess PM_{2.5} exposure for residents living near the rail lines is likely to be linearly related to the diesel rail traffic density, a 50% increase in rail traffic may put these residents over the new U.S. National Ambient Air Quality Standards, an annual average of 12 $\mu\text{g}/\text{m}^3$. “

“Figure 3 shows a time series of PM₁ ($\mu\text{g}/\text{m}^3$) and CO₂ (ppmv) concentrations for a 6-hour period at the Seattle site. We define a “train event” as a single spike or enhancement in PM and CO₂ that is confirmed by



the video images. During the period shown in Figure 3 we identified 8 train events.”

The “site was located in the residential Blue Ridge (BR) neighborhood (47.70°N, 122.40°W), in the City of Seattle, approximately 10 km north of downtown. The instruments and camera were housed on the patio of a residence, which is approximately 25 meters from two active rail lines. The rail lines are immediately adjacent to the shores of Puget Sound and there are no roads in this direction before the shoreline. A video camera was co-located with the instrumentation