Washington State Department of Transportation

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June 13, 2016

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

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

Dear Co-Leads:

Thank you for providing the Washington State Department of Transportation (WSDOT) with this opportunity to comment on the State Environmental Policy Act (SEPA) 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.

With respect to the Millennium proposal, WSDOT's comments will focus on potential impacts to state highway and rail operations.

State Highway System

WSDOT's scoping comments provided to the lead agencies on November 14, 2013 requested that the DEIS address impacts to state highway railroad grade crossings and how increased delays at crossings near state highway intersections and interchanges may impact those highways. While the DEIS did address some of these impacts, additional analysis of the impact of Level of Service (LOS) to the transportation network should be provided in the Final EIS.

Page 5.3-13 of the DEIS notes that vehicle queuing will extend to nearby intersections. However, there is no analysis of these intersections, nor is there an analysis of the impacts to the streets that cross at these intersections. Likewise, Page 5.3-32 analyzes the delay of vehicles at the railroad grade crossings, but not at the nearby intersections. Several grade crossings are close together and will be closed simultaneously. Four private crossings are immediately adjacent to SR 432 and with essentially no queueing space between the railroad and the state highway, WSDOT believes that train traffic over these crossings would back up traffic too, and impact, the state highways. WSDOT requests the analysis includes all queuing information for the interim and full build out scenarios and the associated LOS.

Additionally, railroads often "fleet" trains in single-track territory. In order to increase track capacity, rail dispatch will run multiple closely spaced trains in one direction, then run multiple closely spaced trains in the other. By doing so, multiple trains could run on the same section of track at the same time, as they are

going in the same direction. Part of the improvements proposed by the Longview Switching Company is implementation of this type of dispatching. WSDOT is concerned that trains could be stacked, not permitting vehicle queues to clear between trains.

The Longview Switching Company may make improvements, such as track upgrades, if and when they determine these improvements are warranted. These improvements would result in an increase of the speed limit in this area from 10 MPH to 25 MPH, and permit trains to be spaced closer together. The higher speed limit would result in a shorter gate-downtime at the crossings. WSDOT believes that it is unlikely that a loaded coal train will significantly accelerate in that short distance only to slow down again. Please provide the analysis that trains can and will actually be travelling at speeds up to 20 MPH at these crossings. If this will not be the case, please determine how fast they will be travelling at these crossings and analyze the impact at these crossings and the adjacent intersections. Likewise, if the proponent knows of specific timing for the upgrade, that information should be added and the ramifications of that upgrade analyzed.

A discussion of delay to emergency vehicle response is on Page 5.3-36 of the DEIS. The total gate downtime would increase 130 minutes per day at the public crossings. The DEIS should disclose that the Oregon Way crossing is the only practical route between Rainier and other Oregon communities and medical facilities in Longview. This may warrant a change in the indirect impacts study related to Social and Community Cohesion and Public Services (Chapter 3.2 of the DEIS). Also, multiple accesses to the Weyerhaeuser mill could easily be blocked at the same time by the same train. Please provide a response on how emergency service response time and access can be mitigated in the interim and full build out scenarios. Pedestrian and bicycle safety at highway intersections impacted by increased vehicle delay also needs to be analyzed, and mitigation discussed in the Final EIS.

The basis for the safety threshold described in Chapter 5.3.3.2 and elsewhere is unclear and requires explanation. The Accident Prediction Model is a prioritization tool for allocation of funds between safety projects. The Final EIS should be cautious in suggesting that a model threshold would define a safe versus unsafe crossing.

Given our concerns identified, WSDOT believes that the impact of this proposal will be significantly greater than identified in the DEIS, and the proposed mitigation measures are inadequate. WSDOT respectfully requests additional mitigation based on the additional analysis needed, as identified above.

Rail Operation Impacts

The Washington State Rail Plan capacity analysis relied on 2010 data from the Freight Analysis Framework as well as 2012 data from the Carload Waybill Sample. While the DEIS does acknowledge and describe some limitations of the Washington State Rail Plan, WSDOT has some concerns with the DEIS reliance on the 6 year old data presented in the plan as well as the application of the data. The State Rail Plan data is derived from aggregate data intended to illustrate order of magnitude. Additionally, **infrastructure** changes to the freight rail system **have occurred** since 2010 **and** should be included in the analysis. The Final EIS should consider this and adjust the analysis as appropriate.

The DEIS states that impact to rail transportation by 2028 could be significant on several sections across the state but the implementation of mitigation measures is unclear. As a result, the Final EIS should make sure to include both recent and future improvement to the rail network that are planned or contemplated. The Final EIS should also identify mitigation strategies or an ongoing monitoring process to ensure

improvements are made to address impacts. Additionally, it is unclear if host railroads were consulted or if they provided relevant information for the analysis.

The cumulative impacts analysis should include the use of Stevens Pass as a viable alternative for some increased train volume frequencies. The cumulative impact analysis should also review the possibility that the coal terminal could be fully operational and at peak capacity much sooner than the projected date. While the impacts may not necessarily be different, the timeline for impact mitigation would be.

Please see our specific comments attached. We look forward to working with Washington Department of Ecology and Cowlitz County, the SEPA co-lead agencies, 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

Enclosure: WSDOT comments

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

#	Chapter & Section (page number)	Comment	Reviewer
1	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	DEIS place heavy reliance on the State Rail Plan (SRP) and Freight Mobility Plan (FMP). • SRP data is from 2010 and derived from aggregate data intended to illustrate order of magnitude. • Freight rail world has changed since 2010.	Jason Beloso
2	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Unclear whether host railroads were consulted or provided relevant information for the analysis.	Jason Beloso
3	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Expected routes of empty BNSF trains only shows Stampede Pass. Direction running via Stampede Pass is preferred; Stevens Pass may also be used as an alternate route. Please analyze.	Jason Beloso
4	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	The DEIS says the impacts to rail transportation by 2028 could be significant on several sections across the state (5.1-24). As a result the DEIS should include both recent and future improvements to the rail network that are planned or contemplated.	Chris Herman
5	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Significant impacts to rail operations were identified. The EIS should identify mitigation strategies or an ongoing monitoring process to ensure improvements are made to address impacts.	Chris Herman
6	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Two of the existing grade crossings are on SR 432. Additional analysis of the impact to the Level of Service (LOS) to the transportation network, as described below, should be provided.	Southwest Region Staff
7	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Two public grade crossings are on major city streets near the intersection with SR 432 and/or SR 433. California Way is classified as a Minor Arterial and Oregon Way is a Principal Arterial. Additionally, Oregon Way is the primary route between Rainier and other Oregon communities and various services in the Kelso/Longview area. WSDOT believes that train traffic over these crossings would back traffic up to, and impact the state highways. Additional analysis of the impact to the Level of Service (LOS) to the transportation network, as described below, should be provided.	Southwest Region Staff
8	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	The four private grade crossings serve industries across the tracks from SR 432. These crossings are immediately adjacent to SR 432, and there is essentially no queueing space between the railroad and the state highway. Trucks utilize these crossings as they serve these industries. Additional analysis of the impact to the Level of Service (LOS) to the transportation network, as described below, should be provided.	Southwest Region Staff

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9	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	According to the DEIS, two peak hour trains are predicted in 2028. Additionally, the following circumstances could bunch up trains: • Freight trains don't run on a schedule. They run randomly. Even if they are spaced as they leave the coal mine, trains are delayed for numerous reasons, reducing the space between trains. • Railroads often "fleet" trains in single-track territory. In order to increase track capacity, they will run multiple closely spaced trains in one direction, then run multiple closely spaced trains in the other. By doing so, multiple trains could run on the same section of track at the same time, as they are going in the same direction. • Part of the improvements proposed by the LVSW is CTC dispatching and track upgrades. This would allow closer spacing of trains. WSDOT is concerned that trains could be stacked, not permitting vehicle queues at crossings/intersections to clear between trains. Please provide additional analysis.	Southwest Region Staff
10	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	The proposed coal terminal at Cherry Point will not be permitted by the United States Corp of Engineers. Will that cause pressure to add more trains to the Millennium project? If so, the traffic impact analysis should be revised accordingly.	Southwest Region Staff

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11	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	As noted above, LVSW may make improvements if and when it determines these improvements are warranted. These improvements would result in an increase of the speed limit in this area from 10 MPH to 25 MPH, and permit trains to be spaced closer together. The higher speed limit would result in a shorter gate-down time at the crossings. Table 5.1-4 of the DEIS lists estimated train passing time and speed at several grade crossings, both with and without the proposed track infrastructure improvements. This table shows trains crossing Oregon Way and Industrial Way at 20 MPH. However, even with the proposed rail improvements, these speeds and times are optimistic. There are no plans to increase the speed limit of the railroad bridge over the Cowlitz River above the current 10 MPH. Likewise, the train speeds would be limited at the Millennium site. A westbound train would not be able to accelerate above the 10 MPH limit over the bridge until the end of the train has cleared the bridge. These trains will be 125 cars long with 3 locomotive units. The total length is 6,844 feet per Table 5.1-2. Therefore, the front of the train would be 1.3 miles past the bridge before it could accelerate. Likewise, at the Millennium end, the rear of the train would be 1.3 miles east of the speed restriction as the front of the train enters the coal terminal. The distance between the west end of the Cowlitz River Bridge and the entrance to the coal terminal is six miles. WSDOT believes that it is unlikely that a loaded coal train will significantly accelerate in that short distance only to slow down again. Please provide the analysis that trains can and will actually be travelling at speeds up to 20 MPH at these crossings. If this will not be the case, please determine how fast they will be travelling at these crossings and analyze the impact at these crossings and the adjacent intersections. Are there future improvements planned at the Cowlitz River Bridge? If so, they need to be included in the analysis.	Southwest Region Staff

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#	Chapter & Section (page number)	Comment	Reviewer
12	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Page 5.3-13 of the DEIS notes that vehicle queuing will extend to nearby intersections. However, there is no analysis of these intersections, nor is there an analysis of the impacts to the streets that cross at these intersections. Likewise, Page 5.3-32 analyzes the delay of vehicles at the railroad grade crossings, but not at the nearby intersections. The grade crossings of SR 432 (3rd Ave.) SRMP 7.19 and California Way are very close to each other, and both crossings would be blocked simultaneously. In addition to impacting these roads at the grade crossings, train crossings would also impact the intersection of California Way and Industrial Way (SR 432) and 3rd Ave. (SR 432) and Industrial Way, as well as other nearby intersections. Likewise, the grade crossings of Oregon Way and SR 432 (Industrial Way) MP 5.90 are very close to each other, and both crossings would be blocked by a train simultaneously. This would severely impact the intersection of Oregon Way and Industrial Way. Therefore, WSDOT requests the analysis to include all queuing information for the interim and full build out scenarios and the associated LOS.	Southwest Region Staff
13	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	A discussion of delay to emergency vehicle response is on Page 5.3-36 of the DEIS. The total gate downtime would increase 130 minutes per day at the public crossings. The DEIS should disclose that the Oregon Way crossing is the only practical route between Rainier and other Oregon communities and medical facilities in Longview. This may warrant a change in the indirect impacts study related to Social and Community Cohesion and Public Services (Chapter 3.2 of the DEIS). Also, multiple accesses to the Weyerhaeuser mill could easily be blocked at the same time by the same train. Please provide a response on how emergency service response time and access can be mitigated in the interim and full build out scenarios.	Southwest Region Staff
14	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Pedestrian and bicycle safety at highway intersections impacted by increased vehicle delay needs to be analyzed, and mitigation discussed in the DEIS.	Southwest Region Staff
15	Chapter 5: Operations: Existing Conditions, Project Impacts, and Potential Mitigation Measures	Given our concerns identified above, WSDOT believes that the impact of this development will be significantly greater than identified in the DEIS, and the proposed mitigation measures on Pages 5.3-41 and 5.3-42 are inadequate. WSDOT respectfully requests additional mitigation based on the additional analysis identified above.	Southwest Region Staff

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16	5.3.3.2 Railroad Crossing Performance Measures (5.3-11)	What is the basis for 0.04 (i.e., 1 crash every 25 years) to be the safety threshold? The methodology or precedent used to establish this should be clarified. Accident Prediction Model (AMP) is a prioritization tool for allocation of funds between safety projects. The EIS should be cautious in suggestion that an AMP threshold would define a safe versus unsafe crossing.	Ahmer Nizam
17	5.3.5.1 Statewide Study Crossings - Increase Predicted Accident Probability on BNSF Main Line Routes beyond Cowlitz County (5.3-40)	Same comment as in Vehicle Transportation Chapter - please explain the basis for the 0.04 threshold.	Ahmer Nizam
18	Chapter 6: Cumulative Impacts	Implementation of mitigation measures is unclear. Mitigation measures should be discussed in greater detail.	Jason Beloso
19	Chapter 6: Cumulative Impacts	The DEIS uses 2038 as the analysis year for cumulative impacts (6-2). It is conceivable that the coal terminal could be fully operational and at peak capacity much sooner than this date. While the impacts may not necessarily be different, the timeline for impact mitigation would be. This scenario should be analyzed.	Chris Herman
20	Chapter 6: Cumulative Impacts	Cumulative Impact Locations (Figure 6-1) are constantly evolving. While it may be impossible to accurately document this, discussions related to mitigation should be constrained by the proposed projects that are moving forward.	Chris Herman
21	Chapter 6: Cumulative Impacts	The cumulative impacts analysis should include the use of Steven's Pass as a viable alternative for some increased train volume frequencies (page 6-38).	Chris Herman
22	Chapter 6: Cumulative Impacts	Neither of the projects identified in the cumulative impacts section for both the Reynolds Lead and the BNSF Spur continue to be considered (pages 6-36 and 6-40). This section should be updated to include this information.	Chris Herman
23	6.3.3.3 Analysis Scenarios (6-42)	Please clarify that the 'no action' scenario refers solely to the Millennium proposal.	Ahmer Nizam
24	6.3.3.3 Performance Measures (6-45)	Same comment as in Vehicle Transportation Chapter - please explain the basis for the 0.04 threshold.	Ahmer Nizam

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25	6.3.3.3 Vehicle Queuing (6-48)	Will there be new impacts related to vehicle queues extending from nearby intersection, back over the tracks (i.e., the need to assess installation of traffic signals under MUTCD Warrant 9, and/or arranging for railroad traffic signal preemption)?	Ahmer Nizam
26	6.3.3.3 Statewide Study Crossings (6-53)	Does this factor in warning device activation times - such as with gates crossings where the gates descend in advance of the arrival of the train?	Ahmer Nizam