

City of Washougal comments for DEIS: Millennium Bulk Terminals – Longview, LLC Project

Comment:

According to Section 5.3.5, eight (8) new unit trains are attributed to the project and will pass through Clark County along the BNSF line. These new unit trains will have impacts on at-grade crossing located in the City of Washougal. Washougal has six (6) at-grade crossings. These crossings are shown on Figure 1 – Washougal Rail Crossings, attached. Level of Service and Cause of Delay of Emergency Services impacts resulting from the increased rail traffic from the new unit trains will significantly and adversely impact the citizens, businesses and emergency responders of the City of Washougal.

Section 5.3.4.2 identifies statewide at-grade crossings that were studied for impacts due to increased rail traffic attributed to the project. The crossings identified for study are indicated in Table 5.3-4 and Figure 5.3-6. However, none of the at-grade crossings in Clark County were identified, specifically the six (6) at-grade crossings located in the City of Washougal. Therefore, no analysis of impacts was performed regarding Level of Service and Cause of Delay Emergency Services at City of Washougal at-grade crossings, as was done for other at-grade crossings in the state that were studied. This analysis is discussed in Section 5.3.5 and tabulated in Table 5.3-13. The level of analysis done for the “state-wide” crossings is not as complete or thorough as was done for crossings located closer to the terminal site. The level of analysis is inadequate.

The annual average daily traffic volume for the 32nd Street crossing in Washougal is 12,629 vehicles. This crossing is identified as crossing 6 on the attached Figure 1. This is the highest traffic volume of any grade level crossing along the BNSF rail line between Spokane and the project location, and is higher than any of the studied crossings. 32nd St is located in close proximity to SR14, and serves as a major arterial from the SR14 into Washougal. Impacts to the 32nd Street crossing not only impact 32nd Street, but also SR14. Clearly, with such an AADT and impact, this crossing warrants attention and study for impacts and required mitigation, as do all of the crossings in Washougal and Clark County.

The mitigation measures discussed in Section 5.3.7 fail to adequately address the impacts of the project on the studied at-grade crossings. Adverse impacts are identified, but are not mitigated. It is anticipated that similar unmitigated adverse impacts will occur at the at-grade crossings in Washougal. These impacts must be mitigated.

Recommendation:

A complete study of the impacts of the proposed action on the at-grade crossings located in the City of Washougal (and all of Clark County) should be performed. This study should address Level of Service, Cause of Delay Emergency Services and Predicted Accident Probability, as was addressed for the studied crossings in the vicinity of the terminal. The analysis should be more comprehensive and thorough than was performed for “state-wide” crossings. Adverse impacts should then be adequately mitigated. Replacing the at-grade crossing at 32nd Street with a grade separated crossing located in the vicinity would reduce this impact to a level of non-significance.