

May 24, 2016

When in full operation, Millennium plans to add 16 coal trains a day onto Burlington Northern lines. The route segments from Idaho to Spokane - Spokane to Pasco - Pasco to Vancouver - Vancouver to Longview Junction - Longview Junction to Longview Switching Yard - Longview Switching Yard to Millennium and returning using the route of Longview Junction to Auburn - ALL would be over capacity with these added unit trains. The draft environmental impact statement states:

"It is expected that BNSF would make the necessary investments or operating changes to accommodate the growth in rail traffic, but it is unknown when these actions would be taken or permitted."

.....and it further states that this Proposed Action by Millennium could result in a significant adverse environmental impact on rail transportation.

I ask the Department of Ecology and Cowlitz County.....

What assurances are there that these improvements would be made to the rail lines by BNSF? What assurances are there that these improvements would be made in time to allow Millennium's operation?

The draft Environment Impact Statement is unclear how Millennium's project could be allowed to proceed. Therefore, I am asking for the No Action Alternative.

Sandra Davis
1002 Abernathy Creek Rd.
Longview, WA 98632

Table 5.1-5. Infrastructure Capacity and Projected Rail Traffic

Route Segment	Railroad	Subdivision	Current Traffic Control System ^a	Current Main Tracks ^a	Projected 2028 Capacity (trains/day) ^b	Miles	Estimated Baseline 2015 (trains/day) ^{b,c}	Projected Baseline Trains 2028 (trains/day) ^{b,c,e}	2028 with Proposed Action (trains/day)	Projected 2028 Capacity Surplus (Deficit) ^f
Idaho/Washington State Line-Spokane	BNSF	Spokane	CTC	2	76	18.6	70	106	122	(46)
Spokane-Pasco	BNSF	Lakeside	CTC	1	38	145.5	39	56	72	(34)
Pasco-Vancouver	BNSF	Fallbridge	CTC	1	41	221.4	34	48	56	(15)
Vancouver-Longview Junction	BNSF	Seattle	CTC	2	80	34.8	50	73	81	(1)
Longview Junction-LVSW Yard (BNSF Spur)	BNSF	LVSW	TWC	1	16	2.1	7	7	23	(7)
LVSW Yard-Project Area (Reynolds Lead)	BNSF	LVSW	TWC	1	16	5.0	2	4	20	(4)
Longview Junction-Auburn	BNSF	Seattle	CTC	2	80	118.6	50	73	81	(1)
Auburn-Yakima	BNSF	Stampede	TWC	1	39	139.6	7	11	19	20
Yakima-Pasco	BNSF	Yakima Valley	TWC	1	39	89.4	7	11	19	20

Notes:

- ^a Source Washington State Department of Transportation 2014b.
 - ^b Source Washington State Department of Transportation 2014b (without improvements), except LVSW rail line segments.
 - ^c Source: Federal Railroad Administration 2012; Wolter pers. comm.; Port of Longview pers. comm.
 - ^e Washington State Department of Transportation 2014b.
 - ^f Projected capacity surplus/deficit without infrastructure improvements or changes in operations. Shaded black values indicate a projected capacity deficit.
- CTC = Centralized Traffic Control; TWC = Traffic Warrant Control