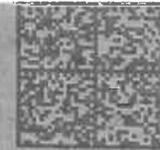


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**Millennium Bulk Terminals – Longview EIS
C/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104**



**Washington State
Department of Transportation**

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November 14, 2013

Millennium Bulk Terminals – Longview EIS
C/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

RE: Millennium Bulk Terminals Environmental Impact Statement (EIS) Scoping Comments

Dear Co-Leads:

Thank you for providing the Washington State Department of Transportation (WSDOT) with this opportunity to comment on the scope of the Millennium Bulk Terminals (MBT) Environmental Impact Statement (EIS). 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 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.

WSDOT's comments on the scope of this EIS will focus on potential impacts from increased rail traffic to the state highway system, freight rail system, and passenger rail service.

As a general comment, it will be important for the EIS to evaluate the cumulative effect of this proposal to the state's transportation system in light of other similar proposals. Also, in addition to the specific transportation related impacts discussed below, it will be important for the EIS to identify and evaluate potential economic benefits and impacts of the MBT project within the state in order to comprehensively understand project implications.

Train Traffic

Rail service is an essential component of the MBT project, which includes the construction of several new industrial railroad tracks at the project site. The EIS should specify the number of trains that would enter and leave the site daily for each of the two MBT project phases, the typical lengths of trains, and rail routes within the state that the trains would use.

It is unclear whether the MBT project will require improvements to rail lines outside of the project site. In addition to the operations and capital needs assessment requested in the Freight Systems Impact section of this letter, any railway infrastructure improvements that are necessary specifically for the MBT project should be included within the scope of the EIS so

that the impact of all related improvements can be assessed. WSDOT requests that all MBT rail-related impacts to the state highway system, and specifically SR 432/433 in the project area, be included in the EIS.

Site Transportation Impacts from MBT Project Construction

WSDOT requests a Traffic Impact Analysis (TIA) be done to disclose the MBT project's transportation construction impacts on the local and state highway systems and ongoing traffic impacts for each phase of the Project. The TIA typically includes:

- Vehicular Trips (trip generation & distribution on the transportation network)
- Level of Service (LOS) Thresholds
- Channelization Thresholds
- Safety Thresholds

State Highway System

The co-leads have released a map of potential BNSF mainline routes that MBT train traffic may use; however, actual train routes have not been specified by MBT or the BNSF Railway Company. For discussion purposes, these comments assume that MBT trains would travel along the following BNSF railroad subdivisions within Washington State: Kootenai River, Spokane, Lakeside, Fallbridge, and Seattle, and thereafter depart from the BNSF Seattle Subdivision toward the MBT facility on branch or spur tracks in the Longview, Washington vicinity. These assumptions are intended to identify the locations of possible impacts to the state highway system if any of these routes are used. It is our understanding that BNSF may employ directional running strategies that would involve shipments to the MBT site using different BNSF routes than empty rail cars from the site (e.g., loaded cars using the identified routes and empty cars using the BNSF Stampede Pass Subdivision). Impacts to state highways along any MBT-related routes not listed above should be similarly assessed if alternate routes are chosen.

WSDOT has identified 3 state highway-railroad grade crossings along the above-listed routes between Spokane and the MBT site, as well as an additional 45 highway intersections and interchanges where operations may be impacted due to delays at nearby highway-railroad grade crossings. Many of these locations already experience some delays under existing train volumes and may not be able to adequately absorb additional delays without mitigation measures. A list of these locations is attached.

WSDOT requests that the EIS include location-specific¹ analysis of how these state highways would be affected by the projected increase in rail traffic, or, if other railway routes are contemplated, how state highways situated along those routes would be affected. WSDOT is

¹ Based on operation and physical characteristics of specific at-grade crossings, intersections, and interchanges, rather than general assumptions.

not only interested in impacts to state highway railroad grade crossings, but also how increased delays at railroad grade crossings situated near state highway intersections and interchanges may impact those state highways. This analysis should include impacts to:

- Levels of service at affected state highway intersections/interchanges;
- Vehicle delay and queuing at state highway grade crossings and state highways impacted by local highway grade crossings;
- Emergency response capabilities; and
- Highway-rail grade crossing safety (i.e., whether modification of warning devices or grade separation might be warranted with the projected increase in rail traffic).

In light of the projected 28% growth to the state's population over the next decade², likely increases in traffic volumes along affected highways should be factored into the assessment.

The EIS should identify and examine strategies to mitigate any adverse impacts from increased MBT-related train traffic on state highways. This should include estimating the cost of implementing those strategies, determining whether public investment would be required, and examining alternate train routes (or combinations of routes) that may result in fewer or less severe impacts to the state highway system.

We also understand that speed restrictions related to aging railway infrastructure are in place along portions of likely MBT routes, including at least one restriction within the City of Longview to 10 miles per hour over the Cowlitz River Bridge. Given the typical length of unit trains that will serve the MBT site, speed restrictions will tend to exacerbate rail-related impacts. All speed restrictions along possible MBT-bound routes should be identified and appropriately factored into the analysis, including possible actions to remove the restrictions.

Freight System Impacts

The economic vitality of Washington requires a strong freight rail system capable of providing its ports, farms and businesses competitive access to North American as well as international markets.

According to Surface Transportation Board Waybill data, the freight rail system in Washington transported 105 million tons of cargo in 2011. The MBT project will have an initial capacity of 27.5 million tons of coal following Stage 1 improvements and 48.5 million tons of coal in addition to an unspecified amount of additional bulk dry or liquid product at an adjacent terminal during Stage 2. This represents a potential increase in tonnage moving on the

² Governor Chris Gregoire, 2013 Policy Brief - Building a Better Future: Investing in Washington's Transportation System, December 2012

Washington freight rail system of 26% following Stage 1 and at a minimum a 46% increase when Stage 2 operations are functioning at maximum capacity (in 2011 numbers).

The MBT project will increase freight rail jobs in Washington but may also increase the risk of capacity constraints and bottlenecks and may inhibit rail system accessibility to some customers. WSDOT recommends that an evaluation of future capacity constraints, bottlenecks and rail system accessibility in Washington be included in the EIS. The EIS should include a detailed operations and capital needs assessment by BNSF to address future bottlenecks and capacity constraints. The assessment should be robust enough to address capacity needs when MBT is operating both at Stage 1 and Stage 2. Particular attention should be given to how the BNSF will ensure adequate accessibility to the rail system for future growth in agricultural, container and other general merchandise train traffic.

BNSF should address other potential operational changes that could impact capacity. These may include: directional running (e.g., all westbound traffic uses the BNSF Fallbridge Subdivision), train fleeting (i.e., running multiple trains in a single direction in short duration, reducing the need to plan train meets), expected impacts of Positive Train Control, resiliency planning, increased speed limits, increased train lengths and the use of distributed power (i.e., locomotives placed in the middle and/or at the end of trains).

As mentioned above, BNSF should provide a list of preferred capital improvements that address expected bottlenecks and other capital constraints. This list could include the following: new train passing sidings or siding extensions, additional sections of double or triple track, additional storage-in-transit or other yard track.

Finally, the assessment should cover all rail line segments in Washington that have the potential to be affected by the MBT project.

Amtrak Cascades Intercity Passenger Rail Service

The Pacific Northwest High Speed Rail Corridor is one of ten corridors designated by the U.S. Department of Transportation for high-speed intercity passenger rail service. The service has been an increasingly strong component of the Pacific Northwest's intermodal transportation system since the Amtrak Cascades' inaugural run in 1994. In its 19 years of operation, the service has increased the number of daily round trips to 11; extended its geographic reach from Eugene, Oregon to Vancouver, British Columbia; and grown the annual ridership from 180,209 in 1994 to approximately 836,000 in 2012.

The states of Washington and Oregon and passengers pay for the Amtrak Cascades service. The United States and Canada pay for border security. The trains run on rail lines privately owned by BNSF and Union Pacific Railroad.

WSDOT has secured nearly \$800 million in federal funding for a series of projects that will increase service reliability and add two Amtrak Cascades round trips between Seattle and

November 14, 2013

Page 5

Portland, for a total of six, by 2017. Although there has been much speculation regarding the potential for additional MBT rail traffic to adversely impact the agency's passenger rail program, WSDOT remains confident that BNSF will continue to meet current and scheduled passenger-rail service commitments that start in 2017 due to federal railroad infrastructure investments.

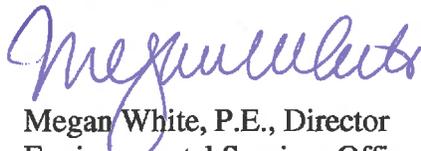
Apart from the federally funded projects described above, WSDOT is also planning for additional Amtrak Cascades service improvements and associated capital projects, as specified in the state's long range plans. Although not currently funded, the Long-Range Plan identifies the following service improvements:

- Additional 7 roundtrips between Seattle and Portland, Oregon, for a total of 13.
- Additional 2 roundtrips between Seattle and Vancouver, British Columbia, for a total of 4.
- Total travel time of 5 hours, 22 minutes between Vancouver, B.C. and Portland, OR.

The EIS should address how the addition of MBT-related rail traffic to Amtrak Cascades rail corridors would affect WSDOT's plans to implement these additional service improvements, and whether capital investment needs identified in long-range plans would still be applicable.

Thank you for the opportunity to comment on this proposal. We look forward to working with the NEPA lead agencies in addressing our comments in the 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:

Attachment

WSDOT MBT EIS Scoping Comments
state highway grade crossings with possible impacts

BNSF Kootenai Subdivision

USDOT Number	City	County	Road Name	Railroad Company	Comments	Railroad Milepost
066236B	Spokane Valley	Spokane	Idaho Rd	BNSF	Adjacent to SR-290	53.37
066239W	Spokane Valley	Spokane	McKinzie Rd	BNSF	Adjacent to SR-290	56.15
066240R	Spokane Valley	Spokane	Harvard Rd	BNSF	Adjacent to SR-290	56.78
066244T	Spokane Valley	Spokane	Barkar Rd	BNSF	Adjacent to SR-290	58.93
066245A	Spokane Valley	Spokane	Flora Rd	BNSF	Adjacent to SR-290	59.9
066367E	Spokane Valley	Spokane	SR-27 Pines Rd	BNSF	Adjacent to SR-290	62.95
066371U	Spokane	Spokane	University Ave	BNSF	Adjacent to SR-290	64.03
066377K	Spokane	Spokane	Park Rd	BNSF	Adjacent to SR-290	66.11



Yellow: State Highway crossing

Green: Adjacent to or near a state highway intersection

**WSDOT MBT EIS Scoping Comments
state highway grade crossings with possible impacts**

BNSF Lakeside Subdivision

USDOT Number	City	County	Road Name	Railroad Company	Comments	Railroad Milepost
066315M	Cheney	Spokane	Pine St/Anderson Rd	BNSF	Adjacent to SR-904	15.82
065970L	Cheney	Spokane	F Street/Cheney Spangle Rd	BNSF	Adjacent to SR-904	16.4
065971T	Cheney	Spokane	Cheney Plaza Rd	BNSF	Adjacent to SR-904	16.82
089665U	Paha	Adams	Paha Packard Rd	BNSF	Adjacent to SR-395 I/C	74.18
089670R	Lind	Adams	Smart Rd	BNSF	Adjacent to SR-21	80.56
089672E	Lind	Adams	Van Marter Ave	BNSF	Adjacent to SR-21	81.82
089673L	Lind	Adams	Neilson Ave	BNSF	Adjacent to SR-21	82.07
089700F		Franklin	Sagemore	BNSF	150' to the west of US 395 at MP 32.31	134.15
089699N		Franklin	Eltopia West Road/Blanton Rd	BNSF	200' to the west of US 396 at MP 37.37	129.12



Yellow: State Highway crossing

Green: Adjacent to or near a state highway intersection

**WSDOT MBT EIS Scoping Comments
state highway grade crossings with possible impacts**

BNSF Fallbridge Subdivision

USDOT Number	City	County	Road Name	Railroad Company	Comments	Railroad Milepost
090031U	Kennewick	Benton	E 3rd Ave	BNSF Railway Company	Adjacent to SR 397 MP 17.23	229.21
090035W		Benton	Dague Rd-E 25th Avenue	BNSF Railway Company	260' southwest of SR 397 MP 15.29	227.47
090036D		Benton	Perkins Rd 7572	BNSF Railway Company	Adjacent to SR 397 MP 14.24	226.41
090038S		Benton	Bowles Rd 9713	BNSF Railway Company	470' west of SR 397 MP 13.46	225.75
090039Y		Benton	Cochran Rd 7810	BNSF Railway Company	Adjacent to SR 397 MP 12.79	225.04
090040T		Benton	Finley Rd 9721	BNSF Railway Company	Adjacent to SR 397 MP 12.33	224.52
090169V	Bingen	Klickitat	Maple St	BNSF Railway Company	170' south of SR 14 MP 66.47. This is the access to the Port of Klickitat, which includes the new Insitu facility & SDS Lumber.	75.76
090168N	Bingen	Klickitat	Walnut St	BNSF Railway Company	190' south of SR 14 MP 66.23. Access to SDS Lumber	75.5
090164L	White Salmon	Klickitat	South Dock Grade Rd	BNSF Railway Company	75' south of Heritage Plaza, which accesses a WSDOT P&R. Connects to SR 14 at MP 64.83.	74.2
090159P		Skamania	Indian Crossing	BNSF Railway Company	AKA Cook Landing Ave, adjacent to SR 14 MP 56.28	65.9
090155M		Skamania	Home Valley Pk	BNSF Railway Company	Adjacent to SR 14 MP 50.08	59.6
090151K		Skamania	Cemetery Xing	BNSF Railway Company	AKA Snug Harbor Dr., adjacent to SR 14 MP 45.37	54.75
090148C	Stevenson	Skamania	Russell Ave	BNSF Railway Company	490' south of SR 14 MP 44.26. Primary access to port facilities, park & industries.	53.89
090135B		Skamania	Skam Landing/Butler Rd	BNSF Railway Company	Adjacent to SR 14 MP 33.5	43.3
090134U		Skamania	Walker/Skam Landing	BNSF Railway Company	130' south of SR 14 MP 32.85	42.6
090133M		Skamania	St Cloud Rd	BNSF Railway Company	110' south of SR 14 MP 29.9	39.72
090061L		Benton	Whitcomb Island Rd	BNSF Railway Company	50' South of SR 14 MP 159.11	171.9

Yellow: State Highway crossing

Green: Adjacent to or near a state highway intersection

WSDOT MBT EIS Scoping Comments
state highway grade crossings with possible impacts

Longview Railroads

USDOT Number	City	County	Road Name	Railroad Company	Comments	Railroad Milepost
101826T	Longview	Cowlitz	3rd Ave-SR 432		SR 432 MP 7.19	1.5
101821J	Longview	Cowlitz	California Way	Longview Switching Company	460' north of SR 432	0.03
101805A	Longview	Cowlitz	SR433-Oregon Way	Longview Switching Company	300' north of intx SR 432/SR 433	0
101794P	Longview	Cowlitz	Indus Way/SR432	Longview Switching Company	SR 432 MP 5.9	1.25
USDOT Number	City	County	Private Crossings	Railroad Company	Comments	
		Cowlitz	Weyerhaeuser Access	Longview Switching Company	Adjacent to SR 432 MP 4.85 (currently closed) Opposite Douglas St.	
		Cowlitz	Weyerhaeuser Access	Longview Switching Company	Adjacent to SR 432 MP 4.76	
		Cowlitz	Weyerhaeuser Access	Longview Switching Company	Adjacent to SR 432, MP 4.43 (opposite Washington Way)	
		Cowlitz	Weyerhaeuser Access	Longview Switching Company	Adjacent to SR 432, MP 4.3 (currently closed)	
		Cowlitz	Weyerhaeuser Access	Longview Switching Company	Adjacent to SR 432, MP 4.18	
		Cowlitz	Weyerhaeuser Access	Longview Switching Company	Adjacent to SR 432, MP 3.88	
		Cowlitz	Aluminum Access	Longview Switching Company	Adjacent to SR 432, MP 3.39	
		Cowlitz	Aluminum Access	Longview Switching Company	Adjacent to SR 432, MP 3.30 (opposite 38th Avenue)	
		Cowlitz	Aluminum Access	Longview Switching Company	Adjacent to SR 432, MP 3.04	
		Cowlitz	Aluminum Access	Longview Switching Company	Adjacent to SR 432, MP 2.88	

Yellow: State Highway crossing

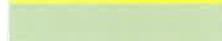
Green: Adjacent to or near a state highway intersection

**WSDOT MBT EIS Scoping Comments
state highway grade crossings with possible impacts**

BNSF Seattle Subdivision – north of Longview Wye*

USDOT Number	City	County	Road Name	Railroad Company	Comments	Railroad Milepost
092481X	Vader	Lewis	SR 506-7th St	BNSF Railway Company	SR 506 MP 6.07	77.83
092484T	Winlock	Lewis	Walnut St - SR505/603	BNSF Railway Company	SR 505 MP 0.01	71.6
092512U	Centralia	Lewis	E Locust St	BNSF Railway Company	215' east of SR 507 MP 1.26	54.2
092514H	Centralia	Lewis	Main St	BNSF Railway Company	250' east of SR 507 MP 1.31	54.1
092515P	Centralia	Lewis	Maple St	BNSF Railway Company	270' east of SR 507 MP 1.52	53.8
092520L		Lewis	Big Hanaford Rd	BNSF Railway Company	335' east of SR 507 MP 4.6	51.8

*This portion of the Seattle Subdivision is located north of the MBT Site, and is included as information on crossings within WSDOT's Southwest Region that could be impacted if trains use this corridor segment. These, and many any other state highway crossings, intersections and interchanges, could be impacted if MBT-related trains use rail lines other than the example routes specified in the scoping letter.

 Yellow: State Highway crossing
 Green: Adjacent to or near a state highway intersection