BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of: Application No. 2013-01 TESORO SAVAGE, LLC TESORO SAVAGE DISTRIBUTION TERMINAL	CASE NO. 15-001 SWORN PRE-FILED TESTIMONY OF BRIAN DUNN

I, Brian Dunn, state as follows:

1. I swear under the penalty of perjury of the laws of Washington and the United States that the following testimony is true and correct.

2. I am over eighteen years of age and am otherwise competent to testify in this matter. My testimony is based upon my education, training, experience, professional qualifications, and understanding of the matters herein.

3. I am an Associate Engineer with Kittelson & Associates, Inc. ("Kittelson") and am the Development Services Manager for Kittelson's corporate office in Portland, Oregon. In my 20 years of professional experience in the field of Transportation Planning/Traffic Engineering I have managed a variety of development-related projects throughout Oregon and Southwest Washington involving the preparation of site feasibility studies, trip generation studies, parking/site circulation assessments, transportation impact analyses, and traffic design services (i.e., signing, striping, and traffic signal plans) for all types of land uses. Many of these projects were conducted in accordance with local and state regulations and procedures established by the Washington State Growth Management Act ("GMA"), State Environmental Policy Act ("SEPA"), and local transportation concurrency ordinances of the City of Vancouver and Clark County. I have

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attached a true and correct copy of my curriculum vitae as Attachment A. As a Professional Engineer licensed in the States of Oregon and Washington, I have been deemed a proficient and qualified engineer, bound to ensure public safety and to promote ethical conduct. In addition to the expectation and requirement to remain current in Transportation Engineering to maintain licensure, my extensive professional experience and training make me an expert in assessing transportation system impacts involving land development projects.

4. In 2013, Kittelson was hired to evaluate the surface transportation impacts of the proposed Vancouver Energy Terminal located at the Port of Vancouver, Washington ("the Terminal"). In conjunction with other Kittelson employees working under my direction, I completed two reports which focus on assessing the traffic impacts of the Terminal and its construction. The first report is titled "Technical Report: Tesoro Savage Vancouver Energy Distribution Terminal Transportation Impact Analysis" ("TIA") with a revised date of July, 2014. This report was contained in Appendix K of the Proposed Draft Environmental Impact Statement ("PDEIS") submitted to the Washington State Energy Facility Site Evaluation Council ("EFSEC") and is Appendix J1 of the Applicant's Revised Application for Site Certification. *See* Ex 0001-PCE. The second report is the "Vancouver Energy Construction Transportation Management Plan" ("CTMP") dated April 30, 2015. The CTMP is Appendix J2 of the Applicant's Revised Application for Site Certification. *Id.* These documents summarize my analysis, professional judgement, findings, and recommendations regarding the potential surface transportation impacts of the Terminal and include pertinent information upon which my recommendations are based.

5. As documented in the TIA, the construction and permanent operation of the Terminal can be achieved while maintaining acceptable levels of service and safety on

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surrounding public streets under the jurisdiction of the City of Vancouver and Washington State Department of Transportation ("WSDOT"), as well as on the private roadways on Port of Vancouver property. Based on technical analysis and professional judgement, the recommendations documented in the TIA include the modification of traffic control devices, addition of posted speed signage, and minor striping enhancements at intersections under Port, City, and/or WSDOT jurisdiction.

6. The CTMP addresses mitigation measures for potential impacts to the transportation system during the Terminal construction in a timely and cost-effective manner while maintaining public safety and mobility through the work area. The objectives of the CTMP are to: 1) describe the project area characteristics, 2) describe proposed improvements and proposed construction staging, routing, and circulation strategies, 3) determine if there will be any height, weight, or width restrictions during construction activities, 4) describe temporary traffic control approach and selection of traffic mitigation measures, 5) identify a plan to maintain mobility and public safety during construction while minimizing delays, and 6) identify project stakeholders and agency staff requiring coordination. The CTMP is a working document used to memorialize key issues and strategies for the project and includes a list of project stakeholders and emergency contacts. The CTMP will be used by the Certificate Holder during construction to ensure ongoing access is provided to the Terminal and all other adjacent properties and businesses in the immediate area.

7. In the Fall of 2015 and through January 2016, Kittelson was hired to review and comment on the Draft Environmental Impact Statement ("DEIS") issued by EFSEC on November 24, 2015. Specifically, Kittelson reviewed DEIS Section 3.14.3.2 (Rail Transportation) to assess the validity of the report's conclusion that the Terminal could have "moderate" to "major" impacts to motorists associated with delays incurred at

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at-grade rail crossings. Our comments on DEIS Section 3.14.3.2 were incorporated into the Applicant's DEIS Comment Letter, dated January 22, 2016. Our review found that the DEIS assessment of at-grade crossing impacts focused on three primary impact metrics: 1) increased gate down times, 2) cumulative total delay for drivers, and 3) cumulative maximum vehicle queue lengths. However, these impact metrics were not compared to any recognized standards or rating criteria. In addition, our review found that the DEIS relied on a series of unfounded or speculative assumptions to produce impact findings. Lastly, save for eight specific at-grade rail crossings highlighted in Table 3.14-15 of the DEIS, this report failed to provide any meaningful analysis or conclusive assessments of impacts at the remaining at-grade crossings along the Columbia River Alignment. Our final response comments encouraged consideration of additional detailed information to refine the DEIS analysis and to further quantify what impacts trains associated with the Terminal would have on rail transportation and whether any impacts are significant or not.

8. More recently, Kittelson performed an investigation of existing transportation conditions and the Terminal impacts at ten specific at-grade rail crossings in the State of Washington, consistent with the methodology we suggested in our DEIS response comments. Seven of the ten crossings are located in the cities of Washougal, Pasco, and Spokane Valley and were selected for analysis because they were identified in the DEIS (Table 3.14-15), and are on the rail corridor that will be used by trains traveling to and from the Terminal, and experience enough motor vehicle traffic demand at the crossing to potentially generate meaningful levels of driver delay and vehicle queues. Three additional crossings in the City of Cheney were added to our investigation due to purported impact of the Terminal unit oil trains at specific crossings.

9. The key focus of our investigation was to assess the current impacts of normal rail activity at each at-grade crossing and the potential impacts of unit oil trains

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associated with the Terminal. The investigation documented a quantitative analysis of impacts to driver delay and vehicle queuing on the intersecting roadways based on extensive data collection and analysis efforts in the following areas:

- Description of the railroad crossing features (number of tracks, crossing surface, control type, signage, and maximum authorized track speed);
- Description of the crossing roadway (functional classification, number of travel lanes, posted speed limit, nearby land uses);
- Summary of observed train activity over the 48-hour data collection period by time of day;
- Crossing gate metrics (maximum and average time of gate deployment);
- Crossing closure times (maximum and average time for the day, maximum associated with the longest observed train, and maximum and average time for the morning and evening peak hours);
- Summary of current traffic volumes on the crossing roadway and estimated maximum queue lengths (including peak hour volumes by time of day and by direction);
- Descriptions of existing, planned, or potential queue management measures along crossing roadway; and,
- Assessment of the Terminal unit oil train impacts.

10. In conjunction with other Kittelson employees working under my direction, I completed a report titled "Technical Report: At-Grade Rail Crossing Analysis for Tesoro Savage Vancouver Energy Distribution Terminal Facility" dated May 12, 2016. This report, which contains my analysis, professional judgement, findings, and recommendations regarding the potential surface transportation impacts from rail traffic, is attached herein as Attachment B.

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11. In summary, our at-grade rail crossing investigation resulted in the following primary conclusions:

- At three of the ten at-grade rail crossings, during existing critical traffic and train crossing periods, motor vehicle queues exceed available lane storage. Although the Terminal does not add increased delay at these three crossings during these periods, potential mitigation measures are identified to either provide additional storage space or enhance the queue management measures or viable alternative travel routes that already exist.
- At the one at-grade crossing location where unit oil trains associated with the Terminal are estimated to generate longer crossing closure times due to the slower speed of unit oil trains relative to current train speeds, no queue storage deficiencies were found as vehicle queues can be accommodated adequately by available lane storage along the adjacent roadway.

12. The following documents are attached to my testimony for reference:

Attachment A: CV for Brian Dunn

Attachment B: Technical Report: At-Grade Rail Crossing Analysis for Tesoro Savage Vancouver Energy Distribution Terminal Facility (May 12, 2016).

[Signature on the Following Page.]

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DATED this 13th day of May, 2016.

Brian Dunn, Declarant

STATE OF Oregon)
)
COUNTY OF Multnomah)

Brian Dunn, being duly sworn upon oath, deposes and says: The foregoing testimony is true, correct and complete to the best of my knowledge, information and belief and is given subject to the laws of perjury in the State of Washington.

GIVEN under my hand and official seal this 12th day of May, 2016.

NOTARY PUBLIC in and for the State of:

Residing at: Portland, OR.

My Commission Expires: April 05/2019

Louisa Maree
Printed Name of Notary:

OFFICIAL STAMP
LOUISA MAREE
NOTARY PUBLIC-OREGON
COMMISSION NO. 937884
MY COMMISSION EXPIRES APRIL 05, 2019

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