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BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL

IN RE APPLICATION NO. 2002-01

**EXHIBIT 34R.0 (DHE-RT)**

BP WEST COAST PRODUCTS, LLC.

BP CHERRY POINT COGENERATION  
PROJECT

**APPLICANT'S PREFILED REBUTTAL TESTIMONY**

**DAVID H. ENGER**

**Q. Please state your name and business address.**

A. David H. Enger, P.E., P.T.O.E.

Transportation Planning & Engineering, Inc.; 2223 112<sup>th</sup> Ave. N.E., Suite 101,  
Bellevue, WA 98004

1 **Q. What has been your role in connection with the Cogeneration Project?**

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3 A. TP&E was a subconsultant to Golder Associates, Inc., providing Golder and BP with  
4 all of the technical traffic analysis for the Application for Site Certification. I have  
5 been the lead engineer on this project for TP&E, and I have also assisted BP in  
6 coordination with WSDOT regarding traffic impact mitigation on Grandview Road  
7 (SR 548).  
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14 **Q. Can you briefly summarize your background and experience?**

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16 A. I am a licensed Professional Engineer in the State of Washington and have been  
17 employed full time in the traffic engineering field since 1975. I am the Vice  
18 President of Transportation Planning & Engineering, Inc., a consulting firm that  
19 specializes in traffic engineering, transportation planning, highway safety, pedestrian  
20 and bicycle facilities, and the design of traffic control devices, street lighting and  
21 intelligent transportation systems. I am a Past President of the Washington State  
22 Section of the Institute of Transportation Engineers, and hold a certificate from that  
23 organization as a Professional Traffic Operations Engineer.  
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34 **Q. What testimony will you be addressing in your rebuttal?**

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36 A. I will be addressing Rodney Vandersypen's testimony, which was filed on behalf of  
37 Whatcom County  
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1 **Q. In Mr. Vandersypen's testimony, he expresses concern about additional traffic**  
2 **at the intersection of Grandview Road and Vista Drive as a result of a new land**  
3 **use development. He suggests that the traffic impacts of the Cogeneration**  
4 **Project be reevaluated in light of that additional traffic. How do you respond**  
5 **to that testimony?**  
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10 A. I spoke with Mr. Vandersypen about this concern on November 7, 2003. The new  
11 land use development he mentions in his testimony is the proposed Delta Tech  
12 Industrial Park. He sent me a copy of the traffic study for the project, entitled  
13 “Intersection Impact Study – Delta Line Road Industrial Park” prepared by Jones  
14 Engineers, Inc., and dated March 14, 2003.  
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22 I've attached a map as **Exhibit 34R.1** to illustrate the key locations at issue. Delta  
23 Line Road is a north-south road that begins at Grandview Road and ends in a cul-de-  
24 sac approximately ½ mile north of Grandview Road. The proposed Delta Tech  
25 Industrial Park would be located on the west side of Delta Line Road, at the north  
26 end of the Road. The Grandview Road/Vista Road intersection that Mr. Vandersypen  
27 mentioned is approximately five miles east of the Cogeneration Project site, and  
28 approximately 0.7 mile west of the Grandview Road/Portal Way intersection. Delta  
29 Line Road intersects Grandview Road approximately 220 feet east of the Grandview  
30 Road/Vista Drive intersection.  
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42 The traffic study for the Delta Tech Industrial Park focused on the impacts of the  
43 project on the Grandview Road/Delta Line Road intersection. Apparently, the  
44 County has decided that Delta Line Road will be closed at the Grandview Road  
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1 intersection. A new east-west road will be constructed approximately 400 feet to the  
2 north of Grandview Road, to connect Delta Line Road with Vista Drive. Existing  
3 traffic on Delta Line Road and future Delta Tech Industrial Park traffic will then use  
4 Vista Drive and the new east-west road to travel between Grandview Road and Delta  
5 Line Road.  
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12 The traffic study for the Delta Tech Industrial Park did not address the closure of  
13 Delta Line Road, or the construction of the new east-west road, or the impacts of the  
14 Delta Tech Industrial Park on the Grandview Road/Vista Drive intersection. These  
15 actions will route more traffic through the Grandview Road/Vista Drive intersection.  
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17 Apparently the County is now concerned about the cumulative impact of the  
18 Industrial Park traffic and the Cogeneration Project construction traffic on this  
19 intersection.  
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28 I have conducted a traffic volume and level of service (LOS) analysis of the Vista  
29 Drive/Grandview Road intersection to identify impacts. As shown in Table 3.15-7  
30 of the DEIS, the Grandview Road (SR 548)/Vista Drive intersection will operate at  
31 level of service “C” during the weekday PM peak hour with peak construction traffic  
32 due to the Cogeneration project. If Delta Line Road is closed, the new east-west  
33 road constructed, and the traffic generated by the Delta Tech Industrial Park begins  
34 before the Cogeneration Project is constructed, then the cumulative effect of this  
35 traffic could reduce the Grandview Road/Vista Drive intersection level of service to  
36 LOS “D”. It is my understanding that the County considers level of service “D” to  
37 be acceptable. To put this change in perspective, LOS C means average delays per  
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vehicle between 15 seconds and 25 seconds, and LOS D means average delays per vehicle between 25 seconds and 35 seconds. Of course, if the Delta Tech Industrial Park and the new east-west road are not opened until after the construction of the Cogeneration Project, then the impacts of the two projects wouldn't be concurrent.

**Q. Mr. Vandersypen also testified that "improvements to Brown Road may be warranted if it is to be used in a significant manner in the course of the project." What is your response to that testimony?**

A. It is my understanding that Brown Road will not be used by Cogeneration Project traffic. The Cogeneration Project will have no impact on Brown Road, and no mitigation will be necessary on Brown Road.

**END OF TESTIMONY**