

Snyder, Jennifer (UTC)

From: Sean Edmison <sedmison@hotmail.com>
Sent: Sunday, June 21, 2015 1:57 AM
To: UTC DL Records Center
Subject: Comments on UTC Rail Safety Rulemaking, Docket # TR-151079

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Dear Mr. King,

The risk of an oil spill here in Washington is already great and only growing. I'd like to answer each of the questions you ask:

What is your definition of a reasonably likely worse-case spill of oil?

- First and foremost, a worse case spill must take into account where the train is traveling and what is alongside that train, as well as what type of crude oil the train is hauling. The risk is not theoretical, as we have seen in the 11 large-scale crude oil derailments since the tragic accident in Lac Megantic in July of 2013. In that accident, an estimated 1.6 million gallons spilled. It is reasonable to assume that a worst-case spill would be the whole 120 car unit train of over 1 million gallons, and up to 3.5 million gallons, of crude oil. The derailment could result in a spill of tar sands or Bakken crude oil and could be in a forested area sparking fires, into the Columbia River during salmon migration, through the middle of a densely populated area like Seattle, or in a rural community where it will be difficult to get resources to the scene.

What is the reasonable per-barrel cleanup and damage cost of spilled oil?

- It is hard to assess the price of human life, environmental quality, clean water, or the lives of other species. We have seen in the disaster of Lac Magnetic where 47 people died that those lives have not been fully accounted for. The UTC needs to take into human health and livelihoods, environmental quality and health, uneven impacts on proximate communities to the rail and crossings, long-term economic impacts of a spill and/or explosion, and the actual cost of cleaning up the spill.

What risk factors should the Commission consider in establishing safety standards at private crossings?

- The risk factors are numerous and include the number of trains, the type of oil being carried, the number and frequency of crossings, the proximity of crossings to communities and bodies of water, a carrier's history of derailment and maintenance, the type of car being used, and the length and weight of train.

Thank you for taking public comment on how to assess the impacts and risks. By strengthening its role around rail safety, the UTC can be a leader in how and what types of impacts are evaluated. As a citizen of Washington, I am counting on you accurately to reflect the risk.

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