Snyder, Jennifer (UTC)

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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?

I live in one of those "rural areas" mentioned below in the general statement answer. In fact, across the road from my house are BNSF railroad tracks (hauling mostly coal nowadays) and just beyond the tracks is the south fork of the Nooksack River. My home, the tracks, and the river are all literally within no more than a few hundred footsteps of each other.
The reasonably likely worse case spill of oil? The river would be intrinsically damaged from the spill down to the bay. "Repair" is such an anonymous word, as if once damaged all it takes is to repair something. Not so with a river system - the animals, plants, water life, the water itself, and the people who depend on this river would be damaged. For the profit of those who continue to gain from an industry that is dying. NO. NO. NO. The only way to prevent disaster, at the all too familiar (and very real, evidential, documented and recent) costs to the lives of human, animal, river, lake - indeed, entire ecosystems -- is to STOP planning expansions of oil by rail, stop allowing oil by rail in present day unless or until (nearly impossible today) safeguards are firmly in place. Loss of jobs? Yes. Loss of profit? Yes. Loss of easy access to oil? Perhaps. Each of these losses can be mediated (except perhaps the huge profits to oil companies. Boo hoo) and this country is up to the task of retraining workers, rebooting consciousness, establishing new, safe, and sustainable sources of energy. Thank you for your time.
- 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 worse 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, and 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: number of trains, type of oil being carried, number of crossings, location of crossing to communities and waterbodies, history of derailment and maintenance, 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 to accurately reflect the risk.

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