

Nov. 5, 2012

GPT/BNSF Custer Spur EIS co-Lead Agencies  
1100 112<sup>th</sup> Avenue NE, Suite 400  
Bellevue, WA 98004

Re: Request for a programmatic EIS that includes coal trains, Tethys Enterprises' water trains and Tesoro oil trains.

**Tethys Water Trains = eight-unit trains round trip per day**

In Oct. 2010, the City of Anacortes signed a water agreement with Tethys Enterprises, Inc., to supply a proposed one-million-square-foot beverage bottling plant <sup>at a</sup> water allotment of five million gallons of water per day, viable through 2051.

The attached research shows Tethys' daily transport of water-related products that would translate into four unit trains per day (eight round trip) from a proposed Anacortes site off Reservation Road, per public records. Rail tracks would be re-laid from Reservation Road over an abandoned, dismantled track right-of-way and connect current rail tracks alongside South March Point Road, paralleling the Highway 20 spur. (Although the attached Tethys public records mention a possible previous site for the beverage bottling plant, the amount of water product produced from four million gallons of water per day—18,000 tons—remains the same.)

- **Eight-unit, round trip water trains per day would join 18 round trip coal trains per day in Burlington and points north/south.**

**Tesoro Oil Trains = four-unit trains round trip per day**

Tesoro's recently completed \$55 million unit train unloading facility on Anacortes' March Point for crude oil—across Highway 20 from the proposed Tethys beverage bottling plant—has the capability of unloading two, 100-car unit trains per 24-hour period. The facility includes four, 25-car ladder tracks, (2) 100-car storage tracks, rail car wash track, pumping facilities including pumps, piping, valves, actuators, and air compressors; all track related elements including sub ballast, ballast, ties, track, and mainline switches provided by BNSF Railway Company; power distribution center; transformers; lighting poles; switchgear and secondary containment liners.

- **Four-unit, round trip oil trains per day would join the 18 round trip coal trains per day in Burlington and points north/south.**

**Total water and oil-unit round trip trains per day along the Highway 20 spur: 12**

**Total water, oil & coal round trip trains per day through Burlington and points north/south: 30**

I request a programmatic EIS that will include 12-unit, water and oil round trip trains per day, causing car/truck traffic congestion along the Highway 20 spur, impacting area farmers, residents and Port of Skagit businesses, including the Skagit Airport and 40 businesses at Bayview Business Park.

I request a programmatic EIS that will include water, oil and coal trains, totaling 30-unit, round trip trains per day, causing car/truck traffic congestion in Burlington and points north/south.

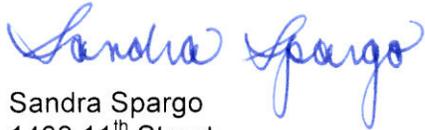
The Washington Utilities/Transportation Commission allows 10 minutes for grade crossings. We are looking at up to 300 minutes of train crossings per day, which equals five hours of grade crossing per day throughout Skagit Valley.

Surely the tourist trade will falter and decrease due to this intense train traffic. Jobs will be gained, but jobs will be lost, because the area's scarred and polluted beauty will discourage tourists. The discouraged will bypass Skagit Valley and spend their money in the San Juan Islands and in Canada. In addition, citizens who can afford upper-end homes will buy elsewhere to avoid intense train traffic and pollution.

Skagit Valley will become Little Tacoma.

Thank you for the opportunity to express my concern.

All the best,



Sandra Spargo  
1408 11<sup>th</sup> Street  
Anacortes, WA 98221

Attachments:

- Tethys Conceptual Plant Site Layout on Reservation Road, Anacortes
- Tethys Enterprises' Import Raw Materials Import & Product Export Chart
- Tethys Enterprises' Rail Car Impact on Burlington
- Public records regarding rail traffic from Matthew Kelly of Tethys Enterprises to Ryan Larsen, City of Anacortes, and Don Wick, Economic Development Assoc. of Skagit County

# Tethys Enterprises' Rail Car Impact on Burlington

*Add 18 coal trains up to 1.5 miles long.*

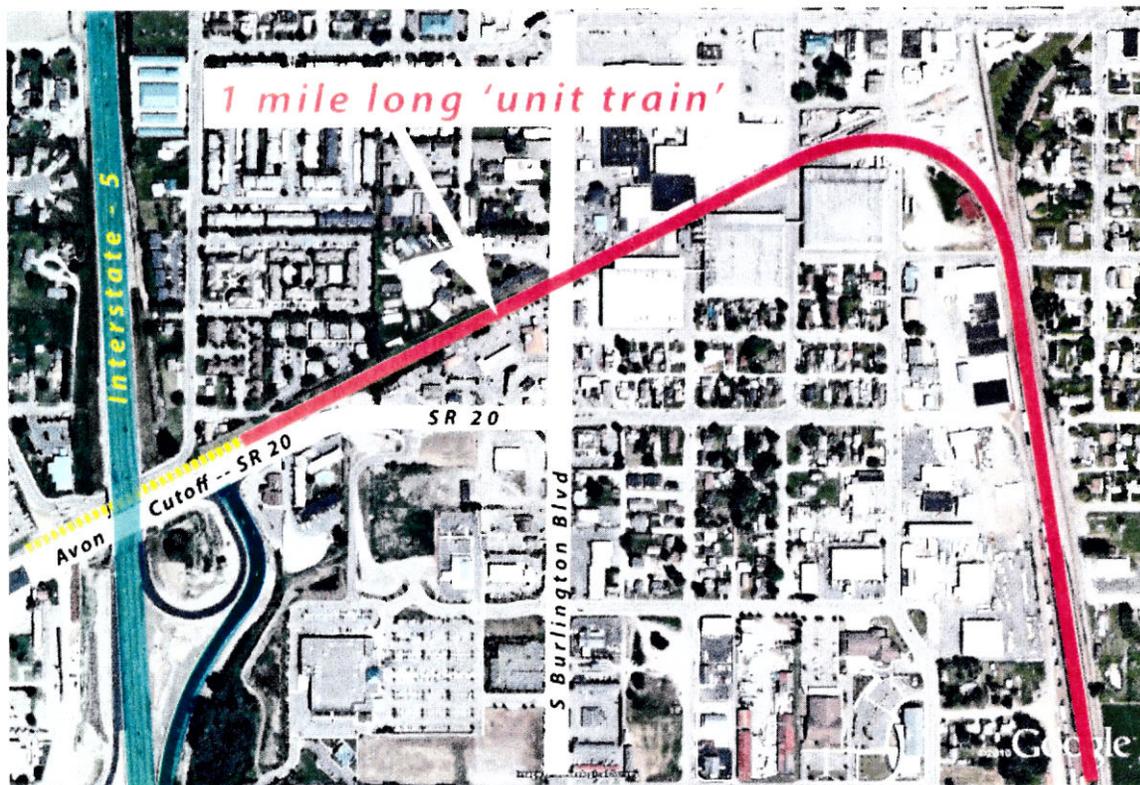
**The City of Anacortes has contracted with Tethys Enterprises to build a one-million square foot bottled beverage/water and food manufacturing plant, the largest in the United States. Tethys' rail traffic will leave Anacortes and pass through Burlington and Mount Vernon. How will rail traffic be mitigated?**

A public records email from Matt Kelly of Tethys, Inc., to Ryan Larsen of the City of Anacortes and Don Wick of the Economic Development Assoc. of Skagit County, states, *"Think 400 rail cars a day—four unit trains—may affect access to the Skagit Airport and other businesses on that side of State Route 20."* The Economic and Fiscal Benefits Memorandum by E. D. Hovee & Company, LLC, anticipates "a volume of 350 rail cars per day." Whether 350 or 400 rail cars, they must make a return trip, equaling 700 to 800 rail cars per day.

A typical unit train consists of 100 rail cars, equaling seven to eight unit trains per day that will travel the rail spur between Anacortes and Burlington. The Washington Utilities/Transportation Commission allows 10 minutes for grade crossings. Seven unit trains equals 70 minutes of grade crossings per day. Eight unit trains equals 80 minutes of grade crossing per day. A unit train is one mile long.

Grade crossing include South Burlington Boulevard, Bayview-Edison Road, Farm to Market Road, Higgins/Airport Way, Avon Allen Road, Pulver Road and Garrett Road.

## Potential Tethys' Rail Traffic Blockage of South Burlington Boulevard and the Avon Cutoff



## Unknown

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**From:** Matthew Kelly [MKelly@StrategySoftware.com]

**Sent:** Monday, April 26, 2010 3:01 PM

**To:** don@skagit.org; 'Larsen, Ryan'

**Subject:** Status

Hi Don and Ryan,

First, thank you both for meeting with us, and please pass our appreciation on to the Mayor for us as well. Very productive meeting.

From the meeting we think that Anacortes is a viable location for the plant. Obviously, however, we have two significant issues beyond access to an adequate water supply that have to be addressed before we should spend time on a contract.

Foremost issue is obtaining a parcel of property proximate to rail that could serve our needs. Tesoro has the land, especially on the West side of March's Point. The question is whether they would have us. We should determine whether they would before moving ahead. There are a number of landowners south of the refineries that may work as well, but the act of herding all of those owners into making a 40 to 50 acre parcel may not be doable either. If Tesoro would be willing, that is the easiest option for all involved.

**The second issue is that of increased rail traffic. We'd be generating significant increases in rail traffic which need to be discussed now before getting any deeper into this. Think 400 rail cars a day – 4 unit trains – and how that may effect access to the Skagit Airport and other businesses on that side of SR 20.**

If we can address these two potential obstacles and get some sense of doability, then we believe the rest is manageable.

Phil is reviewing the MOA Fred supplied us on the water now. Again, pursuing a contract before managing these other issues would be a waste for everyone in our opinion. We think getting more definitive answers on the above topics is the way to move forward for now.

Let's talk when you get a chance.

Many thanks again,

Matt Kelly

Matthew Kelly

[Tethys, Inc.](#)

2722 Colby Ave, Suite 515 | Everett, WA 98201 | Phone: (425) 212-4347 ext. 302 | Fax: (425) 212-4355 | Cell: (425) 220-5779

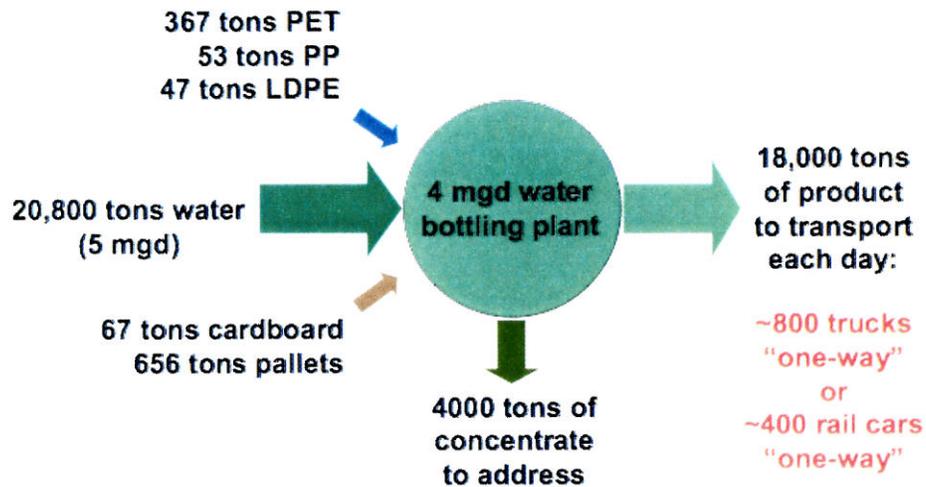


Some Rail Service and Staging Areas  
May Extend an Additional 700' +/-

## Conceptual Plant Site Layout

# Tethys Enterprises, Inc.

## Raw Materials Import and Product Export Based on Entitlement of 5 Million Gallons of Water Per Day from the Anacortes Municipal Water Supply



Mgd: million gallons per day  
PET: polyethylene terephthalate for the plastic bottles  
PP: polypropylene for the plastic caps  
LDPE: low-density polyethylene for the plastic labels and shrink wrap

Adapted from the Life Cycle Assessment of Drinking Water Systems: Bottle Water, Tap Water and Home/Office Delivery Water, Revised Final Peer-Reviewed Report, Oregon Department of Environmental Quality, 09-LQ104, Franklin Associates, Oct. 2009 (with Appendices, Aug. 2009). Rail and truck estimates from industry best practice.

**Defending Water in the Skagit River Basin**  
**360-982-2105/writingconnection@gmail.com**