

**BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL**

*In the Matter of:*  
*Application No. 2013-01*

*TESORO SAVAGE, LLC*

*VANCOUVER ENERGY DISTRIBUTION  
TERMINAL*

CASE NO. 15-001

WRITTEN EXPERT TESTIMONY OF  
BRIAN SCHAEFFER

I, Brian Schaeffer, declare that I am qualified to provide expert testimony in the adjudicatory hearing regarding the application by Tesoro Savage, LLC for the Vancouver Energy Distribution Terminal as set forth below:

I have been the Assistant Chief for the Spokane Fire Department since 2005. Prior to coming to Spokane, I was the Deputy Chief of the City of Yakima, Washington Fire Department from 2003 to 2005 and for Yakima County, WA Fire District 12 from 2001-2002. I served in previous assignments as a Fire Chief in Missouri and Flight Paramedic for an Air Medical Program. I have earned a Bachelor's Degree in Fire Science from Sterling College in Kansas City, Missouri and a Master's Degree in Public Administration from the University of Missouri. I am currently in the dissertation phase of a doctorate degree through Creighton University.

I serve on numerous local and state public safety and health-related committees including a previous Governor appointment to the Emergency Management Council and the State's Homeland Security Committee. From the Hazardous Materials standpoint, I have served in progressive positions as a Hazardous Materials Technician, Specialist and Incident Commander during my fire service employment in the Kansas City, Missouri City Metro Area. In the City of Yakima Fire Department, I led an amalgamation with the Tri-County Hazardous Materials Team which is still in existence today. In my current position, I oversee Operations, Communications, Integrated Health and Training in the Spokane Fire Department.

The 360,000 barrels of crude oil capable of being received at the oil terminal at the Port of Vancouver proposed by Tesoro Savage Petroleum Terminal LLC will be delivered to the proposed Facility by railroad within "unit trains" composed of up to 120 sole-purpose crude oil cars. According to the data contained in the Draft Environmental Impact Statement, the most likely source of crude oil sources would be northern mid-continent crude oil produced in Bakken Oil Fields in North Dakota and Montana, and in Canada. The oil will be transported by existing railroad tracks belonging to Burlington Northern Santa Fe (BNSF). An average of four unit trains per day would travel along the BNSF railroad through the heart of the City of Spokane, including through the downtown core resulting in a total of 1,460 round trips per year of 120 unit oil trains traveling through the City of Spokane as a result of the oil terminal being permitted in the Port of Vancouver. The permitting of the oil terminal will create higher oil train traffic density resulting in the following impacts to the City's fire and emergency response capabilities.

#### 1. Notification.

The Emergency Notification System in use by the City of Spokane, commonly known as Alert Spokane is a fundamental system that supports area identification and single messaging (this system is limited to 7,000 calls an hour). Additional Alert and Warning System functions such as the Emergency Alert System (EAS) must be performed separately. The City of Spokane lacks a Comprehensive Alert and Warning System. Specifically, the existing system cannot notify key facilities (schools, hospitals, assisted living facilities, etc.), of an oil train derailment utilize message sharing and layering, develop plume modeling, or the ability to utilize multiple platforms (e.g. phone, text, internet) for messaging. Lastly, the existing system does not integrate with the Public Alert and Warning System (IPAWS)

#### 2. Evacuation.

The BNSF mainline transects downtown Spokane just north of I-90 and south of the Spokane River. Thousands of citizens work and live within a one mile evacuation radius from the BNSF mainline. Under the current Evacuation Plan, the City of Spokane Police Department would be responsible to provide for the coordinated evacuation of the population from a hazard area, and coordinate their safe return when the threat has passed. The plan addresses evacuation emergency activities for the authorization, direction, routing and relocating of individuals from their homes, schools, and places of business on a very limited basis. This plan was developed to address small-scale incidents; primarily, Wild Land Urban Interface Fires. Nothing in this plan addresses an evaluation of the magnitude necessary to protect those in harm's way within an urbanized city center such as the City of Spokane.

### 3. Sheltering.

Once the public is notified to evacuate to an assembly area, they must be provided with shelter. The City of Spokane and the greater region lack sufficient sheltering capability for an evacuation resulting from a train derailment and subsequent fire within an urbanized center.

### 4. Firefighting Capability

Because of the size and complexity of an oil crude rail tank car related fire incident, the existing capability of the Spokane Community will likely be inadequate and ineffective. Tactical issues such as a lack of AFFF Foam, access and availability of large hose streams and firefighter staffing all contribute to the increasing risk to the Spokane Community.

### 5. Hazardous Materials Team Capability

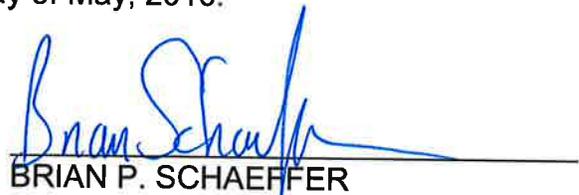
The Spokane Fire Department staffs a Type II Hazardous Materials Response Team with a daily roster of 13 personnel every 24 hours. The team is the only municipal hazardous materials team in the Spokane Region and is often forced to rely on off-duty personnel to fulfill staffing requirements. There are no municipal hazardous materials teams available to the City of Spokane through contract or mutual aid in Washington State. If a derailment were to occur, the crisis would immediately overwhelm the existing team and put responder and citizen lives in danger.

These five issues are not an exhaustive list of Fire Department concerns, nonetheless they do serve as illustration that the City of Spokane Fire Department does not have the capability to respond to this predictable and preventable risk.

## DECLARATION

I, Brian P. Schaeffer, declare under penalty of perjury under the laws of the State of Washington that I make this declaration of personal knowledge, could and would competently testify to its content and that the foregoing is true and correct.

Signed at: Spokane, Washington on this 9th day of May, 2016.

  
BRIAN P. SCHAEFFER