Docket EF-131590

Tesoro Savage CBR
Agency Scoping Comment
#013

Region 10 RTOC
Regional Tribal Operations Committee
"Tribes-RTOC-EPA: Working Together".
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December 18, 2013

Stephen Posner
Interim EFSEC Manager
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Olympia, WA 98504-3172

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DEC 18 2013
ENERGY FACILITY SITE
EVALUATION COUNCIL

SENT VIA EMAIL (efsec@utc.wa.gov)

RE: Tesoro Savage Project

Dear Mr. Posner:

This letter is sent on behalf of the Tribal Caucus members of EPA Region 10's Tribal Operations Committee (RTOC). This letter is not sent on behalf of EPA Region 10 or any employees of EPA, but solely tribal government representatives of the RTOC.

The RTOC is a partnership between the United States Environmental Protection Agency Region 10 (EPA) and elected Tribal representatives from Alaska, Idaho, Washington, and Oregon. The primary function of the RTOC is to serve as a partnership with the EPA to further Tribal environmental objectives at the regional level, to serve as a liaison between the EPA and Tribes regarding information exchange, and to provide assistance to the National Tribal Operations Committee (NTOC).

The RTOC is extremely concerned about the impacts of the proposed Tesoro Savage Project. It is apparent that the impacts, individually and cumulatively, of this project will be felt across the Northwest. Accordingly, the RTOC requests that a comprehensive environmental impact statement (EIS) be completed that analyzes impacts and alternatives of this project along with the impacts of other proposed oil and coal terminals in Washington and Oregon. This EIS must analyze the probable significant adverse environmental impacts that will displace treaty fishing sites; impact cultural resources; generate unacceptable levels of diesel emissions; create real risks of derailments through traditional hunting and gathering sites; and create unsafe navigation conditions for tribal fishers and others on the river. The regional impacts are also profound, including increased tanker vessel traffic risks in salmon rearing grounds in waters off Alaska or at other ports of call. The global climate impacts of oil export and oil combustion are significant.

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Oil transport (by both rail and sea) is problematic when conducted at such scale. Tribal economies, communities, and human health are foremost amongst concerns. In short, we believe that the EFSEC should consider the full scope of the impacts of the oil transport to the environment both cumulatively and specific to each individual tribe in the region.

In addition to these general comments, the RTOC has the following specific comments on the impacts of the proposal that should all be considered and analyzed in the EIS:

1. CULTURAL AND FISHING SITES

The EIS must identify and study all cultural and archeological sites along the rail and vessel transportation corridor and assess possible significant environmental impacts on these resources by virtue of pollutants, as identified elsewhere in the EIS (e.g., diesel emissions, catastrophic spill in land or water).

Moreover, the rail lines travel near many tribal traditional hunting and gathering areas and are adjacent to waters important to fish habitat. It also crosses many of the rivers vital to treaty-reserved resources. The EIS must study how the cumulative oil and coal train traffic will adversely affect tribal traditional fishing, inland hunting and gathering areas by crossing or otherwise harming rivers and watersheds.

This should include noise pollution and vibration affecting fish and wildlife habitat; pollution from diesel emissions; increased risk of derailments due to sun kinks, weight, mudslides, and aging infrastructure further weakened by oil and coal train weight; and risk of environmental damage to Washington watersheds due to a coal train derailment.

2. TRAINS

Transporting coal to proposed terminal sites would require unprecedented levels of regional rail usage. There are concerns not only about dramatically increased rail traffic, but also about negative impacts associated with oil trains specifically, due to train length, weight, content, and polluting capacity. This would likely constrain passenger rail and adversely affect the transport of freight other than oil. The Washington state rail system is already nearing practical capacity; infrastructure would need to be upgraded to accommodate proposed usage. BNSF has been largely silent on the issue of rail improvements; it remains unclear who would pay, and what kind of physical and economic disruption such upgrades would cause.

3. TRAFFIC

"Findings have shown that increases in rail traffic have the potential to result in diseconomies as a result of traffic delays," according to a University of Texas Transportation Center study.[1] Adverse effects include increased risk of accidents, impacts to the city's level of service, decreased ability to provide effective emergency response times, and possible interference with the local freight delivery systems affecting the local economy.

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[1] Available at http://www.trforum.org/forum/downloads/2010_91_Impact_Intermodal_Rail_State_Planning.pdf.

4. NOISE

While there are many sources of noise from trains (high-pitch screeching, idling engines; moving cars, etc.), horn sounding is the most significant. Federal rules governing the blowing of locomotive engine horns require that engineers of all trains sound horns for at least 15-20 seconds at 96-110 decibels (dB) at all public crossings. Decibels in the range of 80-105 are labeled extremely loud, whereas those above 105 are dangerous. Decibels are logarithmic, meaning that 100 decibels is ten times as loud as 90, 110 decibels is ten times as loud as 100, and so on.

While impacts to quality of life from repeated loud noise are self-evident, chronic noise exposure has proven adverse health effects, including cardiovascular disease; cognitive impairment in children; sleep disturbance and resultant fatigue; hypertension; arrhythmia; and increased rate of accidents and injuries; and exacerbation of mental health disorders such as depression, stress and anxiety, and psychosis.

5. PUBLIC HEALTH

Frequent long trains at rail crossings will mean delayed emergency medical service response times, as well as increased risk of accidents, traumatic injury, and death. This is particularly the case in rural areas, including tribal communities, where crossing are limited and emergency service are distant.

Diesel particulate matter emitted by the oil trains and ships are cause for concern with regard to regional air quality and the resultant health effect on humans who breathe that air. The proposed terminal would require a dramatic increase in the number of diesel-burning locomotives along the train line. Diesel particulate matter is a particularly noxious form of air pollution, as it is of sufficiently small size (PM 2.5) to embed in the lung tissue. Diesel particulate matter is associated with both pulmonary and cardiovascular issues, including cancers, heart disease, and asthma. Children, teens and the elderly are especially vulnerable.

6. DERAILMENTS

The use of frequent and lengthy trains to transport oil to the proposed terminal presents a real threat of impacts associated with train derailments. In the summer of 2013, over 50 people lost their lives when a crude oil train derailed in Lac Megantic, Quebec.

For all these reasons, the RTOC requests that a comprehensive EIS by conducted examining the wide variety of impacts and proposing a wide variety of alternatives and mitigation measures. This must include a cumulative effects analysis looking at the cumulative impacts of other proposed oil and coal terminals in the Region. The RTOC appreciates your consideration of these comments.

Sincerely,

Violet Yeaton

Violet Yeaton
Region 10 RTOC
Tribal Caucus Co-chair