



December 11, 2013

Stephen Posner, EFSEC Interim Manager  
Energy Facility Site Evaluation Council  
P.O. Box 43172  
1300 S Evergreen Park Drive, SW  
Olympia, WA 98504-3172

RECEIVED

DEC 11 2013

ENERGY FACILITY SITE  
EVALUATION COUNCIL

Re: Tesoro Savage Vancouver Energy Distribution Terminal  
Application No. 2013-01  
Docket No. EF-131590

Dear Mr. Posner and members of the Energy Facility Site Evaluation Council (EFSEC):

Thank you for the opportunity to comment on the Environmental Impact Statement scope for the Tesoro Savage Vancouver Energy Distribution Terminal, application 2013-01, docket EF-131590.

**The Port of Vancouver is part of the community**

The Port of Vancouver has been a part of the SW Washington community since 1912. We operate our facilities with commitment to our community's economic vitality, safety and environmental quality.

We have a robust community relations program, including outreach specifically for this project. As part of this outreach effort, we are including public participation in the development of our operations and safety plan for the Vancouver Energy Distribution Terminal. Additionally, we are beginning outreach with the City of Vancouver, its downtown businesses and residents in helping to address issues, including safety concerns along the port's spur rail line, which begins just west of I-5 and extends into a new entry into the port. We regularly meet with the neighborhoods, community groups and individuals to share information, take input and ensure the flow of information about this and many other projects at the port.

We are grateful for EFSEC's oversight of the Environmental Impact Statement and the siting of the facility, believing it will make the Vancouver Energy Distribution Terminal a better project for the community, and for our port. We look forward to your recommendations and the robust permitting and oversight process you provide.

**Ports, cargo diversity and the movement of freight by rail**

The Port of Vancouver's state charter directs us to promote trade, transportation and industrial development. The Vancouver Energy Distribution Terminal project is a result

of years of planning, preparation and investment. The port has invested in land acquisition, rail infrastructure, a deeper river channel and other improvements to prepare for tremendous growth, including this project.

Of most consequence is the West Vancouver Freight Access rail project (WVFA), now entering its ninth year. This project has been critical to our ability to accommodate both current and future customers, while increasing efficiency and safety to the regional and national rail network. Put simply, it is the reason why transportation/distribution projects of this scale can be efficiently accommodated at our port.

About \$150 million has been invested in the port's WVFA rail project, including funds from the port, district citizens, private entities and state and federal grants. To date, this rail investment has attracted more than \$500 million in private investment, including increased grain and soy exports, potash and other bulks, in addition to the Tesoro Savage crude oil facility. As a rail-served port, we attract commodities such as these due to their reliance on using rail rather than trucks to access maritime-served markets.

### **Rail capacity on mainlines**

Rail is the most efficient method of moving cargo by land – it can move one ton of freight more than 400 miles on one gallon of fuel. Rail's proximity to, and connectivity between source and market has been included in state and national rail plans.

Washington State's recently completed rail plan, included identification of projects that increase efficiency and safety statewide. Many rail capacity improvements in the plan are already under way; including the Port of Vancouver's West Vancouver Freight Access rail project, which, when completed, will improve the flow of all rail freight through the region by 40 percent.

These efforts, in combination with investments from Class 1 railroad companies such as BNSF Railway, will help ensure additional capacity needs can be accommodated as resources and markets grow.

### **At-grade crossing delays**

The number of trains carrying all types of cargos is increasing, making it even more important to separate train crossings from roadways – an initiative we fully support. Priority at-grade crossings are recognized statewide and regionally, and are included in

the Washington State Rail Plan, and in the Clark County Transportation Alliance legislative agenda.

Additional attention is being placed on this issue through the formation of organizations such as the Great Northern Corridor Coalition made up of eight states, three Canadian Provinces, ten ports, 18 Metropolitan Planning Organizations, and multiple counties, cities and communities along the 3,600 route miles from the Great Lakes to the Pacific. The primary purpose of this coalition is to help leverage local and state funds with federal transportation dollars for projects such as rail crossing safety improvements.

Projects that include new silent crossings and grade-separated crossings in downtown Vancouver have recently been completed. Plans to reduce at-grade crossings in many more communities in the region where train crossings can be disruptive are also under way.

**A “programmatic” EIS is inequitable, subjective and harms movement of all cargo**  
The port welcomes a stringent and thorough Environmental Impact Statement analysis, but objects to additional analysis which includes the transport route and consumption of the product. Permitting for all types of railed cargo must be consistent with legal requirements, uniform, reasonable and equitable. No other commodity at this port is required to undergo this amount of analysis.

Oil and other liquid and dry bulks travel by rail and vessel from the Midwest to the Columbia River today, and have been for many years. A “cradle to consumption” model is excessive, lacks parity and significantly impacts all cargo in our trade and transportation-reliant state. Consistency is critical not only to our port and this commodity, but to every port in the state moving cargo of all kinds.

A “cradle to consumption” EIS is untested, complex and includes criteria and factors that are difficult to quantify for an EIS and that exceed any prior experience. Including impacts from consumption of oil can also be redundant. For example, vehicular emissions laws and monitoring programs already account for the burning of fossil fuels within the United States.

**Other issues outside of the EIS scope**

The port recognizes the need for improved policy on energy and climate change on a national level, but asserts that this issue is far outside the scope of the project EIS. As a port, we are committed to our local approach to addressing climate change and environmental protection, and are constantly improving on our sustainability efforts in these important areas. Our efforts include purchasing 100 percent green energy, an anti-idling protocol, state-of-the-art stormwater treatment, tenant environmental audits, advanced wetland mitigation management and an aggressive recycling program throughout port operations.

The port and its tenants must comply with all local, state and federal laws regarding emissions control. However, climate change requires a comprehensive, statewide and national approach to managing carbon, with all local, state and federal laws regarding emissions control. The application of unique and unproven constraints to this project singles out and places undue burden on the transport of one commodity, one business and our port.

**Conclusion**

Thank you for your time and attention to our scoping comments. We are working hard to improve upon the project as it works through design and as we interact with our community. We applaud your efforts in making this a project that safely provides jobs and economic value to SW Washington, while ensuring a healthy environment where we can live, work and play.

Sincerely,



Todd M. Coleman  
Chief Executive Officer

cc: [efsec@utc.wa.gov](mailto:efsec@utc.wa.gov)  
The Honorable Jay Inslee, Governor, Washington State