



United States Department of the Interior

NATIONAL PARK SERVICE  
Pacific West Region  
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San Francisco, California 94104-2828

In reply refer to:  
L7621 (PWR-NR)

December 10, 2013

Stephen Posner  
Interim EFSEC Manager  
Energy Facility Site Evaluation Council  
P.O. Box 43172  
Olympia, WA 98504-3172

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ENERGY FACILITY SITE  
EVALUATION COUNCIL

Dear Mr. Posner:

The National Park Service (NPS) appreciates the opportunity to provide scoping comments on the Environmental Impact Statement (EIS) for the Tesoro Savage Vancouver Energy Distribution Terminal Project (Tesoro Savage), Application No. 2013-01, Docket No. EF-131590. We understand the project would involve shipment of up to an average of 360,000 barrels of crude oil per day from the Midwestern U.S. to the Port of Vancouver, Washington (Port). The crude oil would be transported over Burlington Northern Santa Fe (BNSF) rail lines, with up to four 1.5 mile long trains arriving at, and departing from, the Port each day. The oil would be stored temporarily at the Port, piped from storage tanks to ships at the Port's marine terminal on the Columbia River, and then transported downriver for distribution to refineries in California and northern Washington. The project includes permitting of two primary, and one back-up, 62 MMBTU/hr natural gas-fired boilers that would be used to heat the tank cars during unloading at the Port.

In accordance with Washington's State Environmental Policy Act (SEPA), the Tesoro Savage EIS should fully evaluate all direct and indirect effects of the crude oil distribution project, including railroad shipment from the Midwest, Port operations, marine vessel shipment and climate change impacts associated with eventual fuel refining and combustion. In particular, we recommend the EIS evaluate potential project impacts on natural and cultural resources, visitor use and enjoyment, and employee and public safety at the following areas managed or administered by the NPS: Glacier National Park (NP) in Montana; Fort Vancouver National Historic Site (NHS) in Vancouver, Washington; Lewis and Clark National Historical Park (NHP) near Astoria, Oregon; and sections of the Lewis and Clark National Historical Trail (NHT), Oregon NHT and Ice Age Floods National Geologic Trail (NGT) along the Columbia River in Oregon and Washington. Detailed comments are provided below.

### Glacier NP

Glacier NP preserves more than a million acres of forests, alpine meadows, lakes, rugged peaks and glacial-carved valleys in the Northern Rocky Mountains. Its diverse habitats are home to nearly 70 species of mammals including the grizzly bear, wolverine, gray wolf and lynx. Over 270 species of birds visit or reside in the park, including such varied species as harlequin ducks, dippers and golden eagles. The park is named for its prominent glacier-carved terrain and remnant glaciers descended from the ice ages of 10,000 years past. Bedrock and deposited materials exposed by receding glaciers tell a story of ancient seas, geologic faults and uplifting, and the movement of giant slabs of the earth's ancient crust overlaying younger strata. The result of these combined forces is some of the most spectacular scenery on the planet.

The BNSF railroad runs adjacent to, and at times forms the southern boundary of, Glacier NP. The rail line borders Bear Creek and the Middle Fork Flathead River, a designated wild and scenic river that is world-renowned for whitewater rafting and fishing. The railroad also crosses several park streams and well-established avalanche chutes. We are very concerned about potential impacts from oil spills and train derailments on gateway communities, as well as on park water quality and aquatic life--specifically the federally-threatened bull trout (*Salvelinus confluentus*) and the westslope cutthroat trout (*Oncorhynchus clarkii lewisi*), a state species of concern. These impacts should be evaluated in the Tesoro Savage EIS.

The 1977 Clean Air Act amendments include requirements to protect air quality in 156 mandatory Class I national parks and wilderness areas, including Glacier NP. The Clean Air Act also directs the NPS to protect air pollution-sensitive resources, including visibility, streams, lakes, vegetation, soils and wildlife in Class I areas. Accordingly, the Tesoro Savage EIS should evaluate the impact of train emissions on air quality in the park.

Visitor and employee safety is a concern at Glacier NP because several high use and developed areas are adjacent to the railroad tracks and more rail traffic increases the likelihood of derailments. In addition, research has shown the current traffic level of about 30 trains per day affects wildlife movement and survival. For example, from 1998-2011, thirty-one out of 290 (11%) confirmed deaths of threatened grizzly bears in the Northern Continental Divide Ecosystem (NCDE) of Montana were due to collisions with trains. Train collisions represent the fourth most common form of human-caused mortality in the NCDE grizzly bear population (US Fish and Wildlife Service, 2013). Increased rail traffic could further restrict wildlife movement and increase mortality in and near the park.

### Fort Vancouver NHS

Fort Vancouver NHS encompasses 209 acres and contains numerous cultural resources associated with American Indians, the Hudson's Bay Company colonial establishment and the first U.S. Army post in the Pacific Northwest. During World War I, Sitka spruce was brought from the Coast Range, including areas of Olympic NP, by railroad to be milled on the grounds of the National Park unit into aviation-grade lumber to support the war effort. The affiliated sites of the Vancouver National Historic Reserve include the City of Vancouver's Old Apple Tree Park, where the region's oldest living survivor of the early colonial days of Fort Vancouver still lives. There are numerous archaeological resources associated with Fort Vancouver NHS including the Fort Vancouver Village ("Kanaka" Village), the pond and Waterfront Complex, and underwater

sites within the Columbia River (the Quartermaster East and Benoit sites). The entire area is a listed National Register District. Today, over one million visitors come to the park and its affiliated sites each year to learn more about the history of the Pacific Northwest.

The BNSF railroad runs through Fort Vancouver NHS and a portion of the lines are on an easement that dates back to 1906 when the original Spokane, Portland, and Seattle (SP&S) Line was built across the U.S. Army post. The EIS should evaluate the potential for Tesoro Savage to adversely affect Fort Vancouver NHS and its affiliated areas of the Vancouver National Historic Reserve. In particular, we are concerned about increased rail traffic associated with the project. This increased rail traffic could have direct and indirect effects on the historic properties of Fort Vancouver NHS. Increased rail traffic may increase the risk of a derailment that could damage irreplaceable cultural resources, and could pose hazards to visitors enjoying the site. For example, some of the areas immediately adjacent to the railroad contain highly sensitive and significant subsurface and submerged archaeological resources associated with the colonial period of the Pacific Northwest. A derailment in these areas could directly damage or destroy these resources. The EIS should include an analysis to address the increased risk of a derailment, or other accident, and how contingency plans would minimize harm of an oil spill on fragile and significant cultural resources on land and potentially in the Columbia River.

Visitor and employee safety is also a concern, including at the heavily-used land bridge trail that runs alongside, and goes underneath, the tracks. Obviously, an accident could endanger visitors that are using the Waterfront, Old Apple Tree Park, or the Confluence Project Land Bridge. The EIS should analyze the increased risk to human health associated with increased train traffic.

We are concerned that the increased rail traffic for the Tesoro Savage project could introduce visual and audible elements that might diminish the ability of visitors (including American Indians and Native Hawaiians) to make connections to the historic properties of the district, including in particular, aspects of feeling and setting. Views from inside and adjacent to the Fort, Village and Waterfront Complex may be disrupted, affecting the ability of the visitor to orient to the historical context of the site. Some of these sites may have a special significance to American Indian tribes. The increased rail noise will be a constant distraction that could further diminish the integrity of the setting and feeling of the Fort, Village and Waterfront. The EIS should address indirect effects associated with the increased rail traffic through Fort Vancouver NHS and its affiliated areas.

The 1916 NPS Organic Act provides air quality protection in all units of the National Park System. Fort Vancouver NHS is located within 10 km of the Port. Because Tesoro Savage has not yet identified the brand of boilers that would be constructed at the Port, we cannot determine whether or not the applicant will need to obtain a Prevention of Significant Deterioration (PSD) air quality permit. Regardless, the EIS should evaluate the impacts of the proposed natural gas-fired boilers on air quality, including visibility, at the park.

#### Lewis and Clark NHP

Lewis and Clark NHP consists of seven sites totaling 3,400 acres in the lower Columbia River estuary and along the Pacific Ocean in Clatsop County, Oregon, and Pacific County, Washington. The park preserves a variety of ecosystems from coastal dunes, estuarine mudflats

and tidal marshes to shrub wetlands, temperate rainforests and swamps. Extensive wetlands in the park include fringing saltmarshes on the lower Columbia River, the tidally-influenced lower Lewis and Clark River and many low-gradient brackish sloughs and marshes. These wetlands provide valuable habitat for a diversity of mammals, birds, reptiles, amphibians and fish.

The Tesoro Savage EIS should evaluate the impacts of potential oil spills from marine vessels on natural resources and visitor use and enjoyment at Lewis and Clark NHP. In particular, the analysis should address the effect that oil spills in the lower Columbia River estuary would have on critical habitat for federally threatened and endangered species that rear in and migrate through NPS waters in the estuary including but not limited to: Pacific eulachon (*Thaleichthys pacificus*), coho salmon (*Oncorhynchus kisutch*), Chinook salmon *Oncorhynchus tshawytscha*, chum salmon (*Oncorhynchus keta*) and steelhead (*Oncorhynchus mykiss*). The analysis should also include potential impacts to water quality and the aquatic environment.

#### National Historic and National Geologic Trails

In Washington and Oregon, the Lewis and Clark NHT follows the Columbia River from its confluence with the Snake River near Kennewick, Washington, to its mouth on the Pacific coast. The Oregon NHT joins the Columbia River east of the Deschutes River in Oregon and follows it west to Vancouver. Ice Age Floods NGT includes the entire Columbia River basin. The three trails provide unique interpretation of the area's cultural and natural history and include several viewpoints along the Columbia River. The EIS should evaluate how increased rail traffic could affect visitor access to, and enjoyment of, trail viewpoints and interpretive displays.

#### Climate Change

Eventual refining and combustion of crude oil distributed by Tesoro Savage will result in greenhouse gas emissions. The NPS is concerned about climate change impacts in parks, including the loss of iconic glaciers at Glacier NP. The EIS should thoroughly evaluate the project's potential impacts on climate change.

#### Spill Response and Mitigation

Tesoro Savage, BNSF and their contracted haulers should be required to develop robust mitigation and emergency response plans for the entire length of the supply and distribution lines. These plans should consider both winter and summer conditions and should provide a rapid response in the event of a train derailment or marine oil spill. In areas of high snowfall, including at Glacier NP, project proponents should investigate construction of snow sheds to prevent derailments and consider alternatives to using explosive devices to control avalanche events along the tracks. To minimize impacts on park resources, visitors and staff, Tesoro Savage and BNSF should coordinate with the NPS and other local responders to develop emergency response plans before the distribution center begins operation.

National Park Service staff can provide guidance on air emission estimates, atmospheric modeling and cultural and natural resource impact assessments for our areas. Please contact Tonnie Cummings, Regional Air Resources Specialist, at 360-816-6201 or [Tonnie\\_Cummings@nps.gov](mailto:Tonnie_Cummings@nps.gov) for additional information.

Sincerely,



Palmer Jenkins  
Deputy Regional Director, Pacific West Region

Reference cited:

U.S. Fish and Wildlife Service. 2013. Draft NCDE Grizzly Bear Conservation Strategy. U.S. Fish and Wildlife Service, Missoula, Montana, USA.

