Docket EF-131590

Tesoro Savage CBR
Agency Scoping Comment
#014

Washington State Department of Transportation

Lynn Peterson
Secretary of Transportation

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EVALUATION COUNCIL

December 17, 2013

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

RE: Tesoro Savage Vancouver Energy Distribution Terminal Environmental Impact Statement (EIS) Scoping Comments

Dear Mr. Posner:

Thank you for providing the Washington State Department of Transportation (WSDOT) with this opportunity to comment on the scope of the Tesoro Savage Vancouver Energy Distribution Terminal Environmental Impact Statement (EIS). WSDOT's responsibility to the citizens of Washington State is to provide a safe and efficient transportation system that supports our economy, communities and the environment. It is therefore essential for the agency to ensure that proposed actions that can impact this mission are carefully assessed to identify potential conflicts and necessary mitigation strategies.

With respect to the Tesoro Savage proposal, WSDOT's comments focus on potential impacts to state highway operations.

State Highway System Impacts

State highway transportation impacts would primarily result from additional train traffic associated with the facility. The proposal estimates that the facility would accommodate 4 daily unit train shipments, for a total of 8 trains traversing the state each day. The proposal also states that "Most trains will arrive from the east on the BNSF Pasco to Vancouver line, entering Washington near Spokane. Empty trains will be returned to BNSF control upon leaving the facility, and BNSF will route them to their future use."

There are many state highway grade crossings and intersections located along or adjacent to the various BNSF mainline routes that would be used to ship products to the facility. While this proposal is for a relatively small increase in total train traffic, this proposal is one of several projects which would add traffic to state rail lines. WSDOT requests that crossings and intersections that have the potential to experience significant impacts be evaluated. WSDOT will endeavor to assist in identifying locations that should be evaluated.

If certain state highway locations would be particularly sensitive to increases in unit train traffic, the EIS should identify and examine strategies to mitigate any adverse impacts, including estimating the cost of implementing those strategies, determining whether public investment would be required, and examining

alternate train routes (or combinations of routes) that may result in fewer or less severe impacts to the state highway system.

The proposal also mentions that "Empty trains will be returned to BNSF control upon leaving the facility, and BNSF will route them to their future use." While this can be construed to mean that empty trains leaving the facility are no longer associated with the facility's operations, the EIS should not be limited to assess impacts from loaded trains bound for the site, but include round trip operations within the state. It is our understanding that BNSF may employ directional running strategies that would involve shipments to the site to travel along different BNSF routes than empty rail cars from the site (e.g., loaded cars using the identified route and empty cars using the BNSF Stampede Pass Subdivision).

The EIS should evaluate the benefits to the state highway system of rail transportation compared with transportation via truck.

Local Transportation Impacts

Based on the current proposal, we do not anticipate there would be significant impacts to vehicle traffic on State Route (SR) 501 which is adjacent to the proposed facility. There may be some temporary traffic impacts during construction but these would only be short term. The EIS should confirm the level of construction and operational traffic impact.

The current proposal includes placing six, 48 feet high, white tanks adjacent to SR 501. Each tank will store up to 360,000 barrels of oil adjacent to SR 501. If a catastrophic event occurred and more than one of these large tanks were to rupture, we see the potential for a large spill to impact WSDOT property and the operations of SR 501. We request that the project proponent work with WSDOT to develop an emergency plan for what will happen to restore highway operations in such an event.

Thank you for the opportunity to comment on this proposal. We look forward to working with EFSEC, the SEPA lead agency, in furthering incorporation of our comments in the EIS. Please contact me at (360) 705 – 7480 if you have any questions or would like to discuss any of these comments.

Sincerely,

Megan White, P.E., Director
Environmental Services Office

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