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ENERGY FACILITY SITE
EVALUATION COUNCIL

December 18, 2013

Stephen Posner, Interim EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-3172
efsec@utc.wa.gov

**Re: Scoping Comments on Proposed Tesoro-Savage Vancouver Energy
Distribution Terminal: Application No. 2013-01; Docket No. EF-
131590**

Dear Mr. Posner,

The Board of Clark County Commissioners submits these comments for consideration in the Scope of the Environmental Impact Statement (EIS) for the proposed Tesoro-Savage Vancouver Energy Distribution Terminal at the Port of Vancouver.

The Energy Facility Site Evaluation Council issued a Determination of Significance (DS) recognizing this crude-by-rail terminal project "is likely to have a significant adverse impact on the environment." We agree, and appreciate the opportunity to provide comments about the scope of the EIS. Given the magnitude of Tesoro-Savage's proposal – a 360,000 barrel-per-day (bpd), crude-by-rail uploading and marine loading facility – in Clark County, we hope our concerns are studied and addressed before this project could be approved.

The county asks the council to consider the wide range of probable significant adverse environmental impacts of the proposed terminal site, as well as moving the commodity by rail to the port and by tanker on the Columbia River.

The EIS also should include analysis of cumulative impacts the proposed terminal could have with other projects being considered elsewhere in the region. This broad perspective is particularly important because regionally significant projects could have significant

impacts on Clark County and we already are involved in those projects' processes. These projects include:

BHP Billiton – The Port of Vancouver has three agreements with BHP Billiton regarding development of a potash export facility at Terminal 5. In June 2011, the city of Vancouver approved site plans for the BHP facility, and the port issued a SEPA MDNS for the project. When fully operational, BHP plans to move 8 million metric tons of potash through the port each year. Construction is expected to begin in 2014, with operations starting “as early as 2017.” The potash will be delivered to the port by rail.

Gateway Pacific – Gateway Pacific Terminal will be a multi-commodity, dry bulk cargo-handling facility on nearly 1,500 acres in Whatcom County, Wash. Rail traffic generated by this facility could be routed through Clark County, but we know of no estimate of the number of trains.

Imperium – A crude-by-rail terminal project to be developed in Grays Harbor. It would add two unit trains through Clark County daily.

Millennium Bulk Terminals – The Board of County Commissioners earlier commented on the Millennium Bulk Terminals and its potential impacts. The project would add as many as 20 trains daily through local communities.

Westway – A second crude-by-rail terminal proposed to be developed in Grays Harbor. The terminal would add two trains through Clark County every three days.

Completion of these projects can reasonably be expected, so the Tesoro-Savage EIS analysis needs to encompass their cumulative impacts with those of the proposed Tesoro-Savage project.

Clark County is not taking a position for or against the Tesoro-Savage project. The board understands the value and necessity of a strong economy and good jobs. We appreciate the company's interest in bringing an estimated \$75 million to \$100 million investment to our county. Still, the county strongly recommends the council require a comprehensive analysis of probable significant adverse environmental impacts of the project.

The county asks that impacts on the following be considered: parks, recreation and scenic resources; movement/circulation of people and goods; existing land use plans; traffic; and, police, fire and emergency services. Also, the EIS must consider alternatives to the project, including a no-action alternative.

The county is specifically concerned about the proposed terminal's proximity to residents of the Fruit Valley neighborhood and the Clark County Jail Work Center on Lower River Road, just 400 yards from the proposed project site. In particular, special consideration must be given to: exposure to toxic chemicals, risk of fire, spills, explosions, and noise.

The Clark County Jail Work Center provides beds for up to 200 minimum security inmates in the custody of the Clark County Sheriff's Office and Washington Department of Corrections. Inmates work on-site or are employed off-site, which requires commuting to and from job sites according to an approved schedule. Some inmates work on-site in the 6,000-square-foot industrial kitchen where inmate meals for the center, main jail and Clark County Juvenile Detention Center are prepared. Other inmates work in the 4,000-square-foot laundry, which provides laundry service for the same facilities, or as grounds-keepers. The center is occupied around the clock, and consideration must be given not only to its staff and inmates but potential disruptions of time-sensitive federal and state constitutionally guaranteed services.

As a party with a known interest in this proposal, we respectfully requests all required SEPA notifications be sent to: Axel Swanson, Senior Policy Analyst, P.O. Box 5000 Vancouver, WA 98666-5000.

Clark County looks forward to being a constructive partner and providing any comment needed throughout the process. If you have questions, please don't hesitate to contact Mr. Swanson at (360) 397-2232 or axel.swanson@clark.wa.gov.

Sincerely,



Steve Stuart, Chair



Tom Mielke, Commissioner



David Madore, Commissioner