

October 26, 2015

Energy Facility Siting Evaluation Council (EFSEC)  
1300 S Evergreen Park Drive SW  
Olympia, WA 98504-3172  
mailto:efsec@utc.wa.gov  
Attn : Mr Stephen Posner <mailto:sposner@utc.wa.gov>  
Attn: Ms Sonia Bumpus <mailto:sbumpus@utc.wa.gov>

**Subject : Proposed Brief Comment Period for Tesoro Savage Terminal DEIS at 45 Days**

I am a retired Professional Engineer with 35 year career experience in the natural gas energy industries as a process, environmental, and safety engineer, as well as a management position in charge of a workforce of 115 employees.

A total of 31,208 comments were received from individuals and private firms during the Scoping Period.

A total of 22 Governmental Agencies comments were received during the Scoping Period.

I would like to suggest that the comment period proposed for the largest crude oil by rail terminal in the United States be extended from the proposed 45 day period to a 90 day period for the following reasons.

Thank You for your considerations,

William A. Brake PE  
3407 NW 116<sup>th</sup> Way  
Vancouver, WA 98685  
[Williamb98685@aol.com](mailto:Williamb98685@aol.com)

CC: Beyond Oil and Coal Task Force – Vancouver Washington – Don Steinke

## EFSEC – TESORO SAVAGE DEIS

### Available Scheduled Time

45 DAYS = NOVEMBER 24, 2015 TO JANUARY 7, 2016

Minus 12 DAYS = Weekends

Minus 2 DAYS = Thanksgiving

Minus 2 DAYS = Christmas

Minus 1 DAY = New Years

***Equals 27 Days to Review Tesoro Savage DEIS = 60 % of 45 day comment period – MORE TIME NEEDED***

***And 18 Days Out of the Office = 40 % of 45 day comment period***

Also Hanukkah December 6 to December 14 = 6 work days of 8 day period

Also Kwanzaa December 26 to January 1 = 5 work days of 5 day period

### Looking At Available Scheduled Time More Closely

45 Days = Tesoro Savage DEIS x 24 hours a day = 1,080 Hours 100 %

27 Days = Potential maximum business review time @ 24 hours a Day = 648 Hours

***Business Work Day is 8 Hours so maximum review time is 1/3 = 216 Hours = 20 % of available comment period – MORE TIME NEEDED***

Business productivity is not 100 % so hours are missed by coffee breaks, snack break, bathroom breaks, meetings, telephone calls, emails, water cooler time, football games, birthdays, holiday pot luck, personal time, etc

***So a typical office environment is at best 75 % productive and at worst 10 % productive then the dedication to the Tesoro Savage DEIS is between 162 hours and 21 hours. – MORE TIME NEEDED***

### Time to Draft Environmental Impact Statement

A lot has happened since the end of the Scoping Comment Period on December 18, 2013 706 days ago

706 Days' Time at 24 hours per day is 16,944 hours to make the document and allow between 21 and 162 hours to make substantive comments on a document that is 4,500 pages in length.

***Allowed between 0.1 % and 1.0 % of time to make Public Comments - MORE TIME NEEDED***

**Typical procedure for an office environment is 23 steps**

1. Assignment from Corporate Office
2. Assignment from Management
3. Assignment from Boss
4. Assignment priority by Boss
5. Assignment Chapters or pages to read
6. Review the Scoping Comment submitted by you or your firm = 31,208 unique people or firms
7. Review the Scoping Comment Submitted by Agencies = 22 unique firms
8. Read to see if your scoping comments were addressed
9. Read for general understanding
10. Take Notes
11. Research on Internet of existing laws and regulations
12. Ask Questions of others
13. Comprehend
14. Develop comments on Tesoro Savage DEIS
15. Write Comment letter for review by Boss
16. Rewrite Letter
17. Resubmit to Boss
18. Rewrite Letter
19. Resubmit to Boss
20. Boss Submit to Management
21. Rewrite Letter
22. Management Submit to Corporate Office
23. Corporate Office Submits

***Minimum 23 steps to do in 21 to 162 hours – MORE TIME NEEDED***

**SUMMERY**

***Between 21 and 162 hours is available to develop an intelligent response to the Tesoro Savage DEIS out of 45 days or 1080 hours available is between 2 % and 15% on the largest crude by rail transfer terminal in possibly the world. – MORE TIME NEEDED***

***In a personal public comment response to the Tesoro Savage DEIS the time available is equal or less than the 21 to 162 hours availability. More in the order of 8 hours maximum is available to make comments on the 4,500 page document. This is volunteer time and not paid time. – MORE TIME NEEDED***