
From: Friends of the Columbia Gorge <Advocacy@GorgeFriends.org> on behalf of Richard Yarnell <ryarnell@operamail.com>
Sent: Sunday, October 27, 2013 2:56 PM
To: EFSEC (UTC)
Subject: Docket No. EF-131590 Application No. 2013-01 Tesoro Savage Vancouver Energy Distribution Terminal Comments

Categories: Comment, Blue Category

Oct 27, 2013

Energy Facility Site Evaluation Council
WA

Dear Site Evaluation Council,

Please deny the permit for the Tesoro Savage Vancouver Energy Distribution Terminal.

Many terrible decisions are made at times of economic turmoil. Our lackluster economic performance is just such a time and the proposed Tesoro Savage project is one of those proposals that might give temporary relief but would prove to be a long term disaster.

I have grave concerns about this proposal and its impact on the Columbia River Gorge National Scenic Area and to the economic vitality of the region near Vancouver and Portland. The scope of review under the State Environmental Policy Act (SEPA) must include the following:

What is the purpose of the project? The purpose statement must not be narrowly worded to only include the construction of an oil terminal for distribution of oil through the region. The purpose should be broad enough to include providing for the energy needs of the region and providing opportunities for appropriate waterfront development that benefits the local community. As with the proposed coal terminals (can you imagine anything except coal and oil trains moving at all in this region if both of those projects are approved?) the true purpose is to export fossil fuels abroad at a time when the policy of the US is to curtail the uses of fossil fuels. We cannot cut down on atmospheric carbon pollution at home while sending the fuel overseas and still think we've accomplished anything.

Is there a need for this project? There is not. This proposal, in conjunction with other existing and pending oil terminals, would result in a glut of oil in the Northwest that would far exceed current consumption. There are alternative waterfront development opportunities that would create jobs and generate greater benefits for the local community.

What are the alternatives? A "no action" alternative; an alternative relying on other oil terminals that already exist, are in the permitting process or under construction; and reducing reliance on fossil fuels all must be considered as viable alternatives. Transport routes that do not pass through congressionally protected areas, like the Columbia River Gorge also must be included in the alternatives analyses. The EIS should also consider reasonably foreseeable waterfront development opportunities that would be incompatible with an oil terminal, such as mixed use development with waterfront amenities.

What are the direct, indirect and cumulative effects of the proposal, including transportation impacts on the Columbia River Gorge National Scenic Area, such as:

- Increased air pollution from train diesel emission. The Gorge already suffered from smog and visibility impairment up to 95% of the time.

- Rail expansion into sensitive areas. Rail lines in the Gorge are currently near capacity. This proposal and other oils by rail and coal export proposals would result in rail infrastructure expansion into sensitive areas in the Gorge, including wetlands, fish and wildlife habitat, rare plant habitat, and cultural resource sites. These likely impacts must be included in the scope of review.

- Likelihood of accidents. Current coal train traffic in the Gorge has resulted in massive amounts of coal dust escaping the open topped rail cars, which weakens the train ballast and causes accidents. The U.S. Surface Transportation Board has determined that coal dust is a "pernicious ballast foulant," weakening rail lines and resulting in derailments. The likelihood of oil train derailments, the likely effects on Gorge resources and the impacts on communities must be analyzed. The result of even one major derailment on either side of the River would be catastrophic from the point of the accident downstream.

- Adverse effects to resources protected by the Columbia River Gorge National Scenic Area Act. The project's indirect and cumulative effects on the scenic, natural, cultural and recreation resources of the Columbia River Gorge National Scenic Area must be included in the scope of review.

In conclusion, SEPA requires that the EIS address impacts to sensitive or special areas, such as the Columbia River Gorge, and the degree that the proposal would conflict with state, local, and federal protections for the environment, such as the Columbia River Gorge National Scenic Area Act. WAC 197-11-330(3)(e)(i), (iii). State law also requires the Governor and all state agencies to carry out their respective functions in accordance with the Columbia River Gorge National Scenic Area Act.

RCW 43.97.025. EFSEC and the Governor are required to review projects for their impacts on the Columbia River Gorge and to take actions to avoid those impacts.

Thank you for considering these comments and including them into the official record.

Sincerely,

Mr. Richard Yarnell
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