From: Cheryl <cheryljuno@aol.com>
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To: EFSEC (UTC)
Subject: Ref application 2013-01/docket EF-131590

Categories: Comment, Blue Category

COMMENTS

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Reference Application No. 2013-01/Docket No. EF-131590

My name is Cheryl Willis and I am a voting residence of Washington state. I am also a health and wellness researcher. I am concerned about the terminal impacts on my neighbors and my quality of and values

· _Human health · _Fish, fisheries, other environmental

· _Home values · _Public costs for rail infrastructure

· _Fracking impacts on water in N.Dak. · _Vessel traffic/spill risk in the Columbia/Unimak Pass

· _Global climate contribution · _Rail traffic/accident risk/pollution

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· There are cumulative impacts: on present, or reasonably foreseeable future activities that will aggregate with or exacerbate the impacts above.

I would like to see the following

· _Requiring safer heavier rail cars · _Tug escorts for tankers

· _A spill or incident cleanup fund · _Parent company guarantees of all liabilities

THREATENED AND ENDANGERED SPECIES

Potentially impacted species which are federally listed, proposed for listing, and/or identified by Washington Dep't of Fish and Wildlife as priority species in the Columbia River or vicinity, include Chinook, chum, coho, sockeye salmon, eulachon/smelt, bull trout, steelhead trout, resident/searuncutthroat trout (*O. clarki clarki*), white (*Acipenser transmontanus*) and green sturgeon, Pacific (*Lampetra tridentata*) and river lamprey (*L. ayresi*), Steller sea lions, California sea lions (*Zalophus californianus*), harbor seals (*Phoca vitulina*), and Sandhill cranes (*Grus canadensis*).

CUMULATIVE RAIL IMPACTS

Cumulative rail impacts include reasonably foreseeable future traffic to proposed and permitted new or expanded coal terminals in the US and BC, and crude-by-rail to refineries and proposed terminals in Washington. See http://protectwhatcom.org/table-wsources-2/ for a link to a table of proposed refinery rail expansions and new terminals. There could be over 30 additional trains hauling PRB coal and Bakken crude-by-rail to Oregon, Washington, and British Columbia destinations, all traveling through Spokane, Pasco, and the Columbia River Gorge moving west. Returning trains would use the Gorge or the passes.

The Washington Department of Transportation (DOT) in its Draft State Rail Plan released September 30, 2013, see http://www.wsdot.wa.gov/Rail/StateRailPlan, describes a network at over 70-90% capacity with 130 mil. tons per annum of all freight. Crude-by-rail proposals equal 53 mil. tons per annum. Together with potential additional coal shipments to proposed or expanded terminals, there must be a programmatic EIS that considers regional rail impacts.

The Federal Railroad Administration (FRA) should be a co-lead with the US Army Corps of Engineers in conducting the federal NEPA review. In addition to having jurisdiction and expertise over rail traffic, they are already in communication with the American Petroleum Institute about concerns with safety of crude trains. See their letter of July 29, 2013, at http://www.fra.dot.gov/eLib/details/L04717, for a list of specific concerns. Tesoro-Savage's permit application notes new tank car construction specifications went into effect October 2011 for DOT-111-type cars – the type that exploded in Lac-Megantic killing over 50 people – but older cars still in use have not all been retrofitted to make them less prone to puncture. Additionally, the railroads have reduced crews on some unit trains to one, forcing the engineer to act as a brakeman, and to leave the train unattended in order to rest – the situation that preceded the incident in Lac-Megantic. Unions have negotiated in vain as railroads reduced crews from four to the lower limit of one. A condition of any crude terminal permit should be that it only accepts deliveries from new or retrofitted DOT-111 trains with a minimum crew of two.

VESSEL IMPACTS

In addition to a programmatic regional rail traffic study, there must be a vessel traffic risk assessment that considers all current terminal proposals on the Columbia River. Again, see the link at http://protectwhatcom.org/table-wsources-2/ for a table that describes the terminals that would add over 1000 coal bulkers, 624 coal barge tows, 125 LNG carriers, and over 400 oil tankers to river traffic. Depending on how many barges are used to move the crude rather than tankers, those vessel numbers will be higher. Also, for every two large ships on the river, there will be one bunker barge, on average, most likely traveling between Grays Harbor and terminals on the River.

Proponents note in their permit application 2012 river traffic was slightly less than 1500 vessels, roughly 1/3 less than the peak of 2086 vessels in 2000. However, the decrease is due to the fact that vessels today are much larger. A Panamax-class bulker or tanker is the size of a Nimitz-class aircraft carrier, and current proposals

could double current vessel traffic with just those largest of vessels, without addition articulated barge tows and bunker barges. Further the world fleet is aging, such that the large vessels pose risks associated with sinkings due to structural fatigue, or collisions or allisions associated with engine or rudder failure (see, e.g., http://gcaptain.com/bulk-carrier-mv-smart-aground-richards-bay/). Newly-hired and trained pilots must attempt to communicate with crews which increasingly have difficulty with English. Further, there is no requirement tankers have tug escorts on the River as they must in the Puget Sound.

Thank you for your attention and study

Cheryl Willis