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BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

IN THE MATTER OF APPLICATION NO. 96-1)
) NO. 96-1
OLYMPIC PIPELINE COMPANY)
)
CROSS CASCADE PIPELINE PROJECT.)
_____)

PRE-FILED TESTIMONY OF
NEIL R. WHITE

ISSUE:
INADEQUACY OF APPLICATION AND IMPACTS ON KITTITAS COUNTY

SPONSOR:
KITTITAS COUNTY

Q. Please introduce yourself to the Council

1 A. My name is Neil White. I have been employed as a land use planner by Kittitas County since
2 1993. I received a BA in Geography with a specialization in Land Studies and a minor in
3 Environmental Science from Central Washington University in 1992. In 1994, I completed a
4 hazard mitigation training course relating to floodplain management at the National Emergency
5 Training Center's Emergency Management Institute in Emmitsburg, Maryland. In October of
6 1997 I was promoted to my current position, Planner II.

7 Q. Please describe for the Council your duties as a land use planner for Kittitas County as they may
8 relate to the subject application.

9 A. I have reviewed and processed all project permit applications administered by the Planning
10 Department and currently interpret and enforce applicable federal, state and local land use codes
11 including, but not limited to zoning, subdivision, floodplain, and shoreline development
12 regulations.

13 Q. Within your experience as a land use planner do you feel comfortable with the Olympic Pipeline
14 application?

15 A. In my opinion, the Olympic Application lacks sufficient detail for meaningful review or evaluation
16 to occur. In my experience as a land use planner, the first step in facilitating a proposal involves
17 determining the completeness of an application. The burden is on the applicant, and not the local
18 jurisdiction, to provide all necessary technical and environmental documentation.

19 Q. In your professional opinion, is the Olympic Pipeline application a complete application.

20 A. No, it is not. In fact, if Olympic's proposal was pending before Kittitas County as a project permit
21 application, no further action would be undertaken by our office until deemed complete.

22 Q. Please give us an example of ways that the Olympic Application incomplete.

23 A. The voluminous pages of this application appear to be based upon a premise that neither the
24 pipeline nor its associated facilities pose a significant risk to public health or safety. Consequently,

1 little information has been provided relating to response times and/or techniques in the event of a
2 pipeline or terminal emergency.

3 Q. Do you have any comments on the issue of water quality as it pertains to the pipeline project?

4 A. Both streambed scouring and lateral erosion pose an uncertain risk of pipeline exposure during high
5 water events. In any discussion regarding ground water quality, it is important to consider the
6 environment one is dealing with. One critical difference between the current proposal and OPC's
7 existing pipeline in Western Washington involves potential impacts to potable water sources.
8 Unlike the more populated areas along the Interstate-5 corridor, the bulk of unincorporated Kittitas
9 County's citizens rely on private domestic wells for both potable and stock water purposes.
10 Consequently, even a minor leak contaminating our aquifers could have a significant detrimental
11 impact on both the economy and public health of Kittitas County.

12 Q. Ms Chaney's testimony indicates that neither the City of Kittitas nor Kittitas County will need to
13 provide special services to the terminal: Do you agree?

14 A. No.

15 Q. Why do you say so?

16 A. Until an emergency services plan relating to the Kittitas Terminal is prepared, informed decisions
17 as to required public services cannot be made.

18 Q. Have you ever seen an emergency response plan for the Kittitas Terminal?

19 A. No. To date, Olympic has not provided a copy of this plan to Kittitas County so we have no means
20 to comment as to its adequacy. We need to have a detailed response plan before we can provide
21 specific comments. Some of those concerns were addressed in our DEIS comments and I'd like to
22 incorporate those comments in my testimony here today.

23 Q. Let us talk about the spill response issues: Have you had an opportunity to review the spill
24 response plan for this project?

25 A. To the best of my knowledge such a plan has not yet been developed. I understand that Olympic

has stated that they will prepare a plan at some point in the future and will then submit it to EFSEC for review and approval; however, at this point they have not provided a copy to our office.

1
2 Q. In the interest of public safety, do you believe it would be essential that the aforementioned plans be
3 prepared and proposed for Kittitas County to comment on before proceedings on the merits of the
4 application and/or environmental review be undertaken in order to properly assess this project?

5 A. Yes, I do. It is essential that local jurisdictions be given the opportunity to review and comment
6 upon this information prior to EFSEC rendering a final recommendation on this matter. It is
7 unreasonable to expect the public to comment on the adequacy of this proposal when Olympic's
8 application remains incomplete.

9 Q. Does this complete your testimony?

10 A. Yes.

11 END OF TESTIMONY OF WITNESS
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DECLARATION OF SERVICE

1 The undersigned certifies under penalty
2 of perjury that on the below date, I
3 mailed or caused delivery of a true copy
4 of this document as authorized by WAC
5 463-30-120(2)(a) to: the Energy Facility
6 Site Evaluation Council and Counsel for
7 All Parties at the regular office or
8 residence thereof.

9 Dated this _____ day of _____ 1999 at
10 Seattle, Washington.

11 _____
12 Paula Polet