



## ROSEMERE NEIGHBORHOOD ASSOCIATION

P.O. Box 61471, Vancouver, WA 98666 [www.RosemereNA.org](http://www.RosemereNA.org)

January 21, 2016

State of Washington  
Energy Facility Site Evaluation Council  
P.O. Box 43172  
Olympia, WA 98504

EFSEC Members:

The DEIS for the proposed Tesoro-Savage oil-by-rail terminal outlines numerous risks to the environment and communities all along the Columbia River.

We oppose the proposed terminal as these risks are too great, cannot be fully mitigated, and thus create excessive and unnecessary dangers to our communities, our citizens, the Columbia River, and our precious water resources.

Derailment Risks:

- A unit train in transit to the proposed Facility or returning to the mid-continent region might derail once every 2 years somewhere along the mainline within Washington state DEIS p 4-28
- The consultants writing the risk assessment for crude-by-rail seemed to minimize the risk by limiting the risk assessment to only 1/3rd of the route. If they had included the entire route in the assessment, there would be three times as many. Tesoro would generate a million tank car shipments every six years. According to the American Association of Railroads, there are 13 train accidents with a release, for each million hazmat tank cars shipped. (Source: <http://www.ncsl.org/Portals/1/Documents/energy/Hellman-present..pdf>)
- Significant oil spills from rail or vessel accidents are certain to occur. According to WA Department of Ecology, at best only 14% of the oil in a spill is ever recovered. Oil spills cannot be mitigated.
- Each derailment could result in oil spills, fires, and explosions causing injury or death. DEIS, p.4-86.
- Even the newest, "safer" rail cars could puncture and explode at speeds as low as 12 mph. DEIS, p.4-27.

Risk from Oil Spills:

- Results of the analyses include the following:
  - The average number of years that would elapse between a derailment of one loaded car that results in a crude oil spill volume of 700 bbl or less is 27 years;

- The average number of years that would elapse between a vessel loading (transfer) spill of 1 bbl or less is approximately 14 years; and
- The average number of years that would elapse between a vessel grounding or collision resulting in a spill of 1,000 bbl is 34 years. DEIS p. ES-14
- The proposed Facility, rail, and vessel safety considerations and accident prevention plans are designed to reduce the frequency of such incidents and to reduce the likelihood of a crude oil spill in the event of an incident (see Appendix D). Nonetheless, accidents could occur and the risk of a crude oil spill, fire, and/or explosion cannot be totally eliminated. DEIS p. ES-14

Risks to local communities / citizens / neighborhoods:

- In the event of a large fire and/or explosion at the proposed Facility, workers, members of the public, and nearby residents of the JWC and Fruit Valley neighborhood could be at risk of injury or death. . . . In an explosion, blast wind could lead to injury or death from violent blunt force trauma from impact with facility infrastructure or explosion debris. The public could be affected if impacts from the large fire and/or explosion affected offsite locations. In that event, other Port tenants or the public could be at risk of injury or fatality. DEIS, p. 4-86.
- In the event of a crude oil fire or explosion along the rail transportation corridor, train operators and the general public in the vicinity of the accident could be at risk of injury or fatality. As stated previously, 12 derailments in the United States and Canada between February 15, 2013, and July 23, 2015 had fires reported, and three of these also had an explosion reported. One incident (Lac-Mégantic, Quebec) resulted in a crude oil spill, explosion, and fire causing injuries and 47 fatalities. Another incident (Mount Carbon/Boomer Bottom, West Virginia) resulted in a crude oil spill and fire with one reported injury. DEIS, p. 4-91.
- In the event of a crude oil fire or explosion along the rail transportation corridor, train operators and the general public in the vicinity of the accident could be at risk of injury or fatality from blast wind, heat, burns, smoke, and fumes; the impacts would be major. DEIS, p. ES-47.

Risks to First Responders:

- Emergency responders in the vicinity of the rail corridor expected to be used by unit trains delivering crude oil to the proposed Facility consider themselves in need of additional training and equipment to effectively respond to a crude oil fire and/or explosion. DEIS, p. 4-88.
- Bakken crude is . . . notably volatile and potentially flammable in a spill situation. This is the greatest concern with respect to public safety in the event of a spill. Its behavior is not unlike spilled gasoline. DEIS, Appendix J, p. 48.
- Vancouver Firefighters Union IAFF Local 452 Opposition to Terminal:

From the Columbian newspaper, October 13, 2015:

*“Citing threats to public safety, the head of Vancouver’s firefighters union told Port of Vancouver commissioners Tuesday that the union opposes a proposal to build the nation’s largest rail-to-ship oil-transfer terminal at the Port of Vancouver. The city is “not staffed appropriately” and “we don’t have the training, and we don’t have the equipment to effectively respond to an emergency at the oil terminal,” Mark Johnston, president of the Vancouver Firefighters Union IAFF Local 452, told port*

commissioners during the port's regular public meeting. The meeting was packed with opponents of the oil terminal (one attendee spoke favorably about the terminal) who blasted the port for hiding information from people and ignoring their safety concerns. Critics also urged the port to cancel its lease with Tesoro Corp., a petroleum refiner, and Savage Cos., a transportation company, in the face of a string of explosive oil train derailments in the U.S. and Canada.

"We're not risk-averse," said Johnston, whose union represents about 185 firefighters with the city and Clark County Fire District 5. "But we understand a disaster down here would be catastrophic," not only for the community, and the port and its neighbors, "but for the first responders as well."

In a news release issued by the Vancouver Firefighters Union Local 452, the union, citing a report by National Geographic magazine, said that in 2014 "there were 143 oil train incidents resulting in 57,600 gallons of spilled oil and at least 47 deaths."

During his testimony Tuesday, Johnston, the firefighter's union president, said that if an oil train disaster occurred, firefighters "wouldn't be able to actively put a fire out." Instead, they'd have to cordon off the area, evacuate people "and make sure that disaster didn't move forward and consume" areas near it.

Johnston also said: "The risk is not worth the benefit."

- Local Union International Labor and Warehouse Union (ILWU) Local 4 Opposition to Oil Terminal:

From [www.ilwu.org](http://www.ilwu.org) Oct 21, 2015:

*"[ILWU Local 4] joined forces with community and environmental allies to stop a scheme by big oil that could ruin their port, close the Columbia River and turn their city into a disaster area.....*

*The possibility of a catastrophic disaster that could wipeout parts of Vancouver and other town became more real on July 6, 2013. That's when a train carrying Bakken crude oil derailed and exploded in a cataclysmic firestorm that destroyed much of Lac-Megantic, a town in Quebec, Canada. The disaster killed 47 residents and injured many others.*

*"Bringing this stuff into our town is just irresponsible and too dangerous," says Local 4's Cager Clabaugh who has told Port Commissioners that "the risk isn't worth the reward."*

#### Risks to Water Resources:

- Once every twenty years, the DEIS predicts that one of Tesoro's oil tankers will crash, rupture, and spill crude oil into the Columbia River Estuary. The DEIS also predicts an oil spill of between 42,000 and 420,000 gallons every 34 years. DEIS, Appx. J, p.41.
- The DEIS does not explain the resources necessary to prevent and clean up an oil spill, but calls for further study. DEIS, pp.ES-17, ES-18

#### Risks to Endangered Fish:

- The increase in deep-draft vessel traffic associated with the proposed Facility could result in a moderate to major long-term effect on nearshore fish including listed salmonids and eulachon species in the lower 33-mile portion (16%) of the Columbia River. DEIS p.ES-32
- The increase in deep-draft vessel traffic and associated increase in vessel wakes could reduce vegetation communities, resulting in a moderate to major long-term change to the resource, indirectly affecting fish species that rely on these habitats to complete their life cycle DEIS p.ES-32

The DEIS outlines many specific risks and does not support sufficient mitigation to address these risks, nor does it adequately address the indirect impacts and cumulative effects of these dangers. The risks from oil spills, train accidents, increased rail traffic all along the rail transportation corridor (including cumulative and compounding impacts to the Columbia River Gorge National Scenic and Recreation Area), increased oil tanker traffic on the Columbia River, air pollution, earthquakes, harmful impacts on tribal culture and resources, harm to endangered salmon, and vehicle delays at railroad crossings.... all these risks cannot be fully mitigated and the potential harm to environmental and human health is too great.

The Tesoro Savage proposal is opposed by the Vancouver City Council, Vancouver Firefighters Union IAFF Local 452, ILWU Local 4, Columbia Waterfront LLC, the City of Portland, the Columbia River Inter-tribal Fish Commission, the sport fishing community, and the environmental community.

Just today Multnomah County Commissioners unanimously passed a resolution to oppose projects that would ship crude oil through the county (KATU NEWS January 21, 2016) thus making Multnomah County the first and largest county to officially oppose this dangerous project.

There is simply too much risk and too little reward from this proposal. Communities along the rail route and the river would take on the risk and Tesoro-Savage would reap the profits by turning the Columbia River into a throughway for oil going elsewhere. A single significant oil spill could devastate the area's economy, fisheries, tribal cultures and economies, and spectacular waters.

We urge you to do everything in your power to deny this project, and recommend Governor Inslee reject the Tesoro-Savage oil terminal.

Sincerely,

The Board of Directors of the Rosemere Neighborhood Association