ATTENTION : Stephen Posner

FROM: CLARK COUNTY LEAGUE OF WOMEN VOTERS P.O. BOX 5917, Vancouver, WA 98668
RE: Tesoro-Savage Vancouver Energy Distribution Terminal, Application No. 2013-01

The Clark County League of Women Voters requests that the following concerns be fully considered during the processing of the application from Tesoro-Savage joint plan to transport crude oil along the Columbia River to the Port of Vancouver, Washington for storage and transfer by ship to other western ports.

Our League embraces a policy that the public has the " right to know" prior to public agencies' final actions resulting in major impacts to the community and its welfare. The Port of Vancouver's decision to solicit and approve the proposed operation--apparently without the other public agencies or the public in general having any knowledge of the project, deprived citizens of the ability to assess or comment during early deliberations. We consider that a serious matter.

Our League has endeavored to find facts and issues in the process thus far, and have many questions and concerns that need to be addressed. We look at all factors of the transportation of the oil, its storage, and its transfer to the proposed river shipping operations. All are connected in the assessment of the project's viability in this environmentally important area.

The site lies on the Columbia River in the Vancouver Lake Lowlands, which is also the home of Frenchman's Bar County Park on the Columbia River, the County's Vancouver Lake Park, with its swimming beach and the site of the Sailing Clubs and various water events. Fishing and hunting are among the river and lake activities year-round. The large Ridgefield National Wildlife Refuge is also just downriver. - A large neighborhood and school are prominent. ALL are closely located downriver and affected by prevailing winds. The location of the storage site is accessible only by one two lane road which passes under the railroad bridge, and avoids crossing the railroad tracks, and a few railroad and bridge crossings. At the present time, rail traffic is substantial enough to block access to and from the area often and for long periods of time.

QUESTION: **How will emergency responders to spills, fire, explosions, etc. reach this area when the increased number of trains will result in a higher number of blockages to the few accesses available to this site? What emergency response facilities will be provided at the site? What agency/agencies will be responsible if there is an accident, be it a spill on site or during the rail transportation and transfer to the storage and then to the ships or barges? What happens if a natural disaster occurs that prevents access to the site?**

Floods and earthquakes are very possible in this area and would isolate the site even more. With the number of additional trains expected to be added by this project along the Columbia River, through the city of Vancouver, and northward, local traffic to existing businesses and residences will be a major problem. A recent warehouse collapse caused a 10-hour rail shutdown, and a huge backup of trains.

Of serious concern regarding transportation is the condition of the rail cars to be used. There are statistics showing danger to the community regarding DOT111 cars for hauling oil. These cars have valves sticking out of the tanks on the top or bottom that shear off when they derail and overturn, releasing the contents. They also have structural integrity issues that allow them to easily split open and spill contents when derailments and crashes cause them to overturn. According to FOXBUSINESS on 11-14-13, two trade groups, The Association of American Railroads and the American Shortline and Regional Railroad Association, recommend upgrades or phase out on 78,000 older fuel cars and upgrades on 14,000 newer cars made since October 2011. The 78,000 cars are of the DOT 111 series that has been recognized as being unsafe since 1991 in derailments and crashes.

QUESTION: What type of fuel rail cars will be provided for the oil transport, when statistically 84% of all available cars are older and unsafe, and the remaining ones also need upgrading? Who will be responsible for the necessary upgrades? Each customer? or the Tesoro-Savage group as contractor? Will safer cars be mandated?

Another unknown is the type of oil which will be carried by these trains. In response to a question during an online chat sponsored by *the Columbian,* one participant asked if Tesoro and Savage would be able to bring Canadian tar sand oil by train to the Port of Vancouver, Tesoro-Savage states "we haven't yet broken ground on the project, and don't have customer commitments lined up, so it's premature to speculate where they might source crude oil." …."we expect the bulk of the crude will come from the Bakken and other fields in the Midwest."

Savage reports that it will have customers other than Tesoro, and that the new facility will handle a maximum of 380,000 barrels a day. We assume that these trains will also be returning to the mines, which doubles the time railways will be occupied. It was mentioned that the empty trains could return via the passes rather than the Columbia River rail lines. We have been told that adding more traffic to those passes may not be possible.

QUESTION: How many fuel trains per day would be needed to transport 380,000 barrels per day? Is the average length of these trains approximately 110 cars? What effect will this have on the many commercial and residential crossings along the Columbia River and Clark County as a whole? How will the noise and vibration effects be mitigated—or what will be the impact on our county citizens? And will we be seeing double the number of trains because of the empty returning cars?

QUESTION: How do you judge the project impacts without knowledge of who the actual participants' customers are, and what the type of crude oils handled will be? How can a permit be granted to hypothetical customers and unknown sources/types of crude oil?

Tesoro -Savage has stated that every ship coming in to accept oil will be boomed to control any oil spills. The number of ships or barges has been estimated to be one a day--if ships, but many more if barges are used.

QUESTION: Since some oils sink, what will prevent the oil beneath the surface booms from travelling down the river with the current, and leaving deposits on the bottom and the river banks? How would this affect fish &wildlife, water quality and drinking water safety of downstream communities?

Emissions from the transport, handling, storage and transferring of oil to ships will present varied degrees and types of pollution to the air, water and ground in the surrounding areas. Note: The only monitoring of air quality was centered in areas some miles away on the higher grounds away from the lowlands area which will be affected by this project. It may be that the sea-level area would be impacted at a higher degree than the uplands areas. Another concern is that there are no standards currently existing for mitigation of the predicted 100,000 tons of greenhouse gases predicted. That amounts to 276 tons per day. Our country is striving to reduce these gases, not increase them!

QUESTION: Beside the daily emissions year-round, will the impact on the neighboring recreational areas be greater during the summer months of high public use? Does the volume of emissions increase and cause deterioration of air quality in warmer weather? Is there any notification to neighbors in the event of excessive amounts? Does the fallout from any of the emissions also affect the water or ground quality, and if so, can it be prevented? How?

In conclusion, we feel it is essential to look at the collective impact from the major potential influx of rail transport of hazardous fuels throughout our State, the potential for spills both on land or river, the addition of tons of greenhouse gases plus other chemical emissions on the proposed site, the air, noise, vibration and blocked- roadway impacts from the added railway traffic and the daily increase of ship/barge traffic on the Columbia River. There are also likely to be monetary costs to the public for necessary infrastructure, which preferably should fall to the user companies.

THE LEAGUE OF WOMEN VOTERS OF CLARK COUNTY URGES YOU TO CONSIDER ALL OF THESE ISSUES WHEN DETERMINING THE APPROVAL AND COST/BENEFIT OF THIS MAJOR PROPOSAL. THE IMPACTS ON OUR COUNTRY, STATE, RIVERSIDES, CITIES, CITIZENS AND OUR ECONOMY BEGIN AT THE MINES AND END AT THE FINAL DESTINATION OF THE FINISHED PRODUCT, WHICH COULD BE OVERSEAS.

Respectfully submitted from the Clark County League of Women Voters Action Committee:
Judy Hudson, Dr. Orin and Joann Swanson, Dan and Jane Johnson, Anne McEnerny-Ogle 12/06/2013