

January 21, 2016

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

Re: Tesoro Savage Vancouver Energy Distribution Terminal
Draft Environmental Impact Statement

To Whom It May Concern:

Multnomah County, Oregon appreciates the opportunity to comment on the draft environmental impact statement (DEIS) for the Tesoro Savage Vancouver Energy Distribution Terminal (Vancouver Energy Project). Though the DEIS does not directly address project impacts to Multnomah County, concerns about impact to our community health and well-being are real. We join the City of Vancouver, International Longshore and Warehouse Union Local 4, Oregon Physicians for Social Responsibility, and first responders and community members on both sides of the Columbia River in opposition to The Vancouver Energy Project.

The Vancouver Energy Project will result in an additional 360,000 barrels of crude oil being shipped by rail each day through the Columbia River Gorge. The DEIS suggests that these shipments would travel primarily along the Washington side of the Columbia Gorge. However, given congestion that already exists in this corridor, it is reasonable to expect a significant amount of this crude-by-rail will travel on the Oregon side of the Gorge and therefore through Multnomah County.

Multnomah County recently completed risk assessment of crude-by-rail shipment through the county (attached), which shows that more than 25% of Multnomah County's population lives within one-half mile of rail lines that are used by crude-by-rail trains. People of color are overrepresented in the one-half mile impact zone, making crude-by-rail an environmental justice issue for Multnomah County. In addition, 108 schools, 100 child care centers, and \$25 billion dollars of improved property lay within the one-half mile area surrounding crude-by-rail lines. Finally, while one-half mile is what is recommended by the Oregon Fire Marshal as the evacuation area from a crude-by-rail fire, a fire would release a toxic plume placing people's health at grave risk for much greater distances.

Multnomah County joins the rest of the country in being very concerned about the current safety standards of existing rail cars. These cars were never intended to carry this cargo and do not have safety mechanisms in place to mitigate the devastatingly explosive potential. The first responder community has been working diligently to adequately prepare to address this hazard, yet no fire department in Oregon or Washington has adequate equipment or supplies to effectively fight a sweet crude oil fire. Evacuations are dangerous and require significant numbers of responders, a luxury many communities cannot afford. Many of the people living within the one-half mile radius are not even aware of this hazard and are not prepared. It would be reckless to consider moving forward with a new crude-by-rail project until these concerns are addressed.

The DEIS does not adequately address climate change as an issue. Multnomah County is committed to addressing the challenge of climate change, the impacts of which will fall hardest on those who are already the most vulnerable in our community. The dedication to this shared goal by individuals, business, non-profits and local government in Multnomah County has led to the reduction of greenhouse gas emissions by 14% below 1990 levels in the County. Importantly, this represents a 35% decrease in greenhouse gas emissions per capita in Multnomah County, all while increasing economic and community prosperity. The DEIS does not adequately address this issue by failing to recognize the climate impact of contributing to the burning of over 360,000 gallons of crude oil each day. To put this in perspective, Multnomah County contributes 15.8 million metric tons of carbon emissions each year communitywide. The oil shipped through the Vancouver Energy Project will contribute between 56 and 61 million metric tons of carbon globally each year, over 3 times the entire emissions generated in Multnomah County. The costs of these increased carbon emissions far outweigh the community benefits from the project. \$30 dollars per ton is considered a conservative cost estimate of the health, social and environmental impacts of emitting one ton of carbon. Over the 20 year project lifetime, the Vancouver Energy Project will contribute over \$33 billion dollars in adverse public health, social and ecological impacts globally, with significant impacts felt locally.

Regardless of whether crude-by-rail ultimately travels through Oregon or Washington, the potential impacts on the Columbia River Gorge are simply not worth the risk. The Columbia River Gorge is a sacred space for Native American people, and is cherished by people across Oregon and Washington. Recreation and tourism in the Columbia River Gorge is a half-billion dollars contribution to the economy. The value of this resource cannot be overstated and the risk of desecrating this space to continue to grow an industry that must be phased out to address climate change does not make financial, ecological, or ethical sense for the community.

Given all of these concerns, and the lack of mitigation measures identified within the DEIS to address them, Multnomah County asks that the Energy Facility Site Evaluation Council halt development of The Vancouver Energy Project. At a minimum, Multnomah County asks that the Energy Facility Site Evaluation Council require these elements before advancing The Vancouver Energy Project or any other project of its kind:

- 1) Completion of a Health Impact Analysis of the project, including water and air quality impacts to surrounding communities in Oregon and Washington from crude-by-rail trains, cargo ships, and port facilities;
- 2) Development of a carbon mitigation strategy that addresses the project's global climate impacts;
- 3) Assurance from local and state emergency management offices, and the Offices of the State Fire Marshals in Oregon and Washington, that first responders and community members are prepared to respond to a crude-by-rail incident.

Please contact Tim Lynch, Senior Policy Analyst, at (503) 988-4094 or tim.j.lynch@multco.us with any questions.

With appreciation,

John Wasiutynski
Director | Office of Sustainability
Multnomah County