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January 22, 2016

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

Re: AWO Comment on the Vancouver  
Energy Draft Environment Impact  
Statement (DEIS)

Dear Energy Facility Site Evaluation Council:

On behalf of the American Waterways Operators, the national trade association for the tugboat, towboat and barge industry, thank you for the opportunity to comment on the Vancouver Energy Draft Environment Impact Statement.

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat and barge industry, which is a vital segment of America's transportation system. The industry safely and efficiently moves over 800 million tons of cargo each year, including more than 60 percent of U.S. export grain, energy sources such as coal and petroleum, and other bulk commodities that are the building blocks of the U.S. economy. The fleet consists of more than 4,000 tugboats and towboats, and over 27,000 barges of all types. Tugboats also provide essential harbor services in ports around the country. The tugboat, towboat and barge industry provides the nation with a safe, secure, low-cost, environmentally friendly means of transportation for America's domestic commerce.

Washington State receives tremendous environmental and economic benefits from a strong and sustainable domestic maritime industry. In addition to jobs and a solid tax base, waterborne transportation is the safest, most environmentally friendly, and most cost efficient mode of commercial freight transportation. Coastal barges can move one ton of cargo over 1,200 miles per gallon of fuel, compared to 478 miles per gallon for rail, and 150 miles for truck.<sup>1,2</sup> Marine freight transportation also has the smallest carbon footprint among all transportation modes. Truck transportation produces 171.83 tons of carbon dioxide per ton mile, and rail produces 21.35 tons, compared to fewer than 16.41 tons produced by coastal barge transportation.<sup>3</sup>

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<sup>1</sup> Sause Bros., Technical Specifications for "Wind Class" Barge

<sup>2</sup> Texas Transportation Institute, A Modal Comparison of Domestic Freight Transportation Effects on the General Public 2001-2009, February 2012, <http://www.nationalwaterwaysfoundation.org/Research.html>.

<sup>3</sup> Id.

AWO members are committed to building on the natural advantages of marine transportation and are committed to high standards and continuous improvement of marine safety and environmental protection.

The towing industry has an excellent record of safely transporting oil cargoes. According to the U.S. Coast Guard, spills from tank barges have declined consistently and dramatically since the early 1990s.<sup>4</sup> In 2013, tank barges spilled just one gallon of oil for every four million gallons transported.<sup>5</sup> In 2012, the Coast Guard submitted a statutorily mandated report to Congress on improvements to reduce human error and near miss incidents in the maritime industry. The report detailed the significant decline in the number of oil spills and the volume of oil spilled from tank barges over the past two decades and attributed these improvements to a combination of federal regulation and industry initiatives, including implementation of the landmark Oil Pollution Act of 1990, industry adoption of safety management systems including the AWO Responsible Carrier Program, and in-depth vetting of vessels by oil shippers.<sup>6</sup> The results have been even more dramatic in Washington State, where not a single oil spill of cargo has occurred from an allision, collision, or grounding since 1988. A recent study from the Washington State Department of Ecology on oil transportation notes that there has been a “great degree of success with vessel spill and accident prevention measures in Washington waters.”<sup>7</sup>

The American Waterways Operators supports Tesoro Savage Petroleum Terminal LLC’s application for Site Certification to construct and operate the Vancouver Energy Distribution Terminal Facility in Vancouver, Washington. The towing industry stands ready to conduct the marine transportation portion of this project in the safest manner with highly-qualified personnel aboard double-hulled, Coast Guard-inspected barges. The Vancouver Energy project will create hundreds of family-wage maritime and shore-side jobs in a region of Washington that has struggled economically. The Vancouver Energy Terminal is an important infrastructure project not only for the state and region but also for the entire country. The American Waterways Operators urges you to recommend its approval to Governor Inslee.

Sincerely,



Charles P. Costanzo

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<sup>4</sup> Coast Guard-AWO National Quality Steering Committee, *Towing Industry Safety Statistics 1994-2013*, July 2014, <http://www.americanwaterways.com/sites/default/files/2013%20Towing%20Industry%20Safety%20Statistics.pdf>

<sup>5</sup> Id.

<sup>6</sup> 2012 Coast Guard Report to Congress, *Improvements to Reduce Human Error and Near Miss Incidents*, May 2012, <http://americanwaterways.com/sites/default/files/legacy/index/20120507HumanErrorandNearMiss.pdf>

<sup>7</sup> Ferguson, Scott; *2014 Marine & Rail Oil Transportation Study*, Washington Department of Ecology Publication 15-08-010, March 2015.