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Re: Green Apple Renewable Fuels Project SEPA Threshold Determination

Dear Ms. Bommarito and Ms. Keenen,

Thank you for the opportunity to provide comments on the Green Apple Renewable Fuels Project and review the content submitted on the SEPA checklist and other documents. We hope to provide a constructive perspective to help inform your threshold determination. The proposal documents include an initial, but ultimately insufficient, review of the additional spill risk created by the Project. **Given many lingering uncertainties posed by this project, the Puget Sound Partnership recommends that a Determination of Significance be made so that a more complete accounting of risks can be conducted.**

The Partnership appreciates that the Project's proponents have provided an overview of some general results from the 2015 Puget Sound Vessel Traffic Risk Assessment (VTRA) – done by George Washington and Virginia Commonwealth Universities – pertaining to potential changes in regional likelihood of oil spills of different sizes. However, several items related to employing the VTRA are not addressed in the SEPA checklist:

- The proposal estimates that 76 inbound feedstock vessels and 68 outbound product vessels would visit the facility each year. However, if the rail shipment volumes are lower – as the proposal acknowledges may occur – the frequency of vessel transits could more than double. The impacts of this possibility should be clarified in a Determination of Significance.
- The proposal only minimally describes the routes of those vessels. Given the high variation in spill risk across different Puget Sound waterways, specific routes should be clarified in a Determination of Significance.

- The proposal provides some statistics that characterize the baseline risks of oil spills projected for the region. However, it omits the likely additional spill risks posed by the new Green Apple-related vessels above that baseline.
- The proposal tends to provide only a “rolled up” view of oil outflow risk to Puget Sound as a whole, neglecting an examination of potential additional risks to local (sub-regional) waterways (Rosario Strait, Guemes, etc.). Waterway specific risk assessments should be included in a Determination of Significance.
- The proposal omits potential accident risks (i.e., of groundings, collisions, allisions), which previous VTRA modeling has shown to be relatively higher for this class of vessels in the area. These risks should be assessed in a Determination of Significance.
- This proposal minimally describes its fueling/bunkering requirements. The proposal mentions that an aboveground pipeline would be built to provide fuel gas, which would seem to reduce marine oil spill risk posed by additional bunkering operations—if it was a condition for permitting/approval. Bunkering processes are highly relevant to spill risk, and should be clarified in a Determination of Significance. For example, the “VTRA 2010” simulated the addition of nearly 500 bulk carriers (non-oil or biofuel cargo) to this area annually, and found that the addition of bunkering vessels led to a (somewhat surprising) large rise in potential oil spill outflow.

Because these omissions would tend to conceal the potential rise in risks to local waterways posed by the project’s vessels (and their potential interactions with existing baseline traffic), we encourage you to make a Determination of Significance to provide an opportunity to more clearly assess the related risks.

Federal, regional and state entities like the US Coast Guard, Puget Sound Harbor Safety Committee, Washington State Board of Pilotage Commissioners and Department of Ecology have established additional regulatory and voluntary vessel traffic management measures for this area. This potential addition of vessel traffic deserves additional opportunity for deeper review by the maritime community. The Partnership supports a Determination of Significance to further explore and document the potential effects of this project.

Thank you again for the opportunity to provide feedback.

Sincerely,



Todd Hass, PhD
Special Assistant to the Director