



**NORTHWEST ENVIROMENTAL DEFENSE CENTER**  
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*Submitted via email to [dpolacek@portoflongview.com](mailto:dpolacek@portoflongview.com)*

Dan Polacek  
Communications Coordinator  
Port of Longview  
10 Port Way  
Longview, WA 98632

**Re: Port of Longview's Proposed Lease with Haven Energy for a Propane and Butane Terminal**

Dear Mr. Polacek:

The Northwest Environmental Defense Center (NEDC) submits these comments regarding the adverse impacts that are likely to result from the Haven Energy Terminal at the Port of Longview. Based on NEDC's mission to conserve and protect the natural resources of the Pacific Northwest, we are concerned about the adverse environmental impacts and irreparable harm to the surrounding community that will result from the construction and operation of the proposed project. As such, these comments are designated "environmental." Given the risks created by Haven Energy's proposal, however, our concerns relate equally to safety issues.

The propane and butane export terminal will dramatically change the landscape of the Pacific Northwest. Specifically, Haven Energy's terminal will:

- Increase marine vessel traffic along the Columbia River, causing greater shoreline erosion, increased turbidity, greater risk of introducing invasive species in ballast water, more vessel strikes of large marine mammals, additional stranding of juvenile salmon on beaches from large wakes, and increased risk of oil spills or accidents.
- Result in greater air pollution to the region.
- Cause reduced water quality in the area, with subsequent adverse impacts to aquatic life. The Columbia River is home to significant recovery efforts for listed salmon. Reduced water quality from this project is likely to reverse much of those efforts.
- Increase rail and marine vessel traffic, thereby increasing the risk of an oil spill. This increased risk poses a danger to public safety and the natural resources of the area.

On top of these adverse environmental impacts, Haven Energy's proposal poses a grave danger to the safety of the community surrounding the Port of Longview, as well as communities located along the rail lines throughout the state of Washington. Haven Energy proposes to

transport the propane and butane in DOT 112 tank cars. The Port of Longview and Haven Energy claim these tank cars have a strong safety performance record. Unfortunately these claims ignore reality. Since at least as early as 1991, the United States Department of Transportation recognized that “[i]n hazardous materials accidents, class 112 cars had by far the highest accident rate in all major cause groups.” See U.S. Department of Transportation, *Tank Car Accident Data Analysis*, Report No. DOT/FRA/ORD-91/05 (June 1991) (attached as Exhibit 1). More recently, on January 7, 2014, DOT 112 cars carrying liquid petroleum derailed and caught fire near Plaster Rock, Canada. Almost 50 nearby homes had to be evacuated.

In considering the lease with Haven Energy, the Port of Longview has the opportunity to define the future for the Port and the surrounding community. The Port must critically review the Haven Energy’s bare claims of job creation and safety measures, and weigh those factors against the environmental and safety risks posed by the project.

NEDC urges the Port to deny Haven Energy’s request for a lease to construct and operate the propane and butane terminal along the Columbia River. At the very least, the Port should recognize the magnitude of impacts likely to result from this project, and in turn give extra scrutiny when deciding whether signing the lease is the proper next step. Pursuant to Washington’s State Environmental Policy Act, the Port must assess the environmental impacts of the proposal before committing itself to one course of action under the lease. Plus, the Port should ensure that all non-privileged considerations of this lease are made in full view of the public, as required by Washington’s Open Public Meetings Act.

Moving forward with Haven Energy’s terminal by signing the lease will change the Port, and the surrounding community, forever. Thus the Port must address these important and difficult questions related to environmental harm and public safety now.

Sincerely,

Marla Nelson  
Staff Attorney