

Thousands and thousands of people are speaking up against Shell's oil train project in Skagit county. Here are some notes to help you join them.

Why should you write your own Scoping Comments?

The scoping comment period is a chance to talk about anything that you care about that Shell's reckless oil train project threatens, and why it is important. Each of us has people and places that we know and love. And because you know it best, you can best speak to why it is important.

I am convinced that an honest and thorough study of the environmental impacts of Shell's oil train project will mean that the project can't be permitted. So we need an honest and complete analysis. Scoping is the chance to have our say in what that means.

Many of the comments sent in will be general. To complement the huge public outcry demanding a comprehensive scope for the environmental review, we will need many unique, substantive, individual comments - each raising specific issues, and flushing out the details of the general topics.

It doesn't hurt to write more than one scoping comment.

How should it Start?

Introduce yourself. If you have professional experience related to the project or related to the impacts, certainly mention it. Do you live near the refinery? Do you live, work or go to school near the rail corridor? Do you drive over an at-grade crossing regularly?

Here is a map showing the rail routes used by oil trains in case you aren't sure:

www.blast-zone.org

Do not state an opinion about whether the project should be allowed or not, the agencies will disregard these comments.

What is the thesis?

My high school english teacher once told me "don't make it difficult for your audience to figure out your thesis." She's right. The agencies are going to have to read thousands of these comments. Make interpreting yours easy. Try something like this:

Please study _(impact)___by ___(the part of the project that will cause the impact)___ because
_(significance of the impact)___ .

How do I prove that a possible impact is significant?

The EIS should include any impact that is reasonably likely to be “more than moderately harmful” to atmosphere, water, air, natural resources, etc. and the human and/or non-human life they sustain. You can demonstrate significance by talking about:

- People - describe who and where people may be impacted, and how many could be impacted.
- Places- describe how specific ecosystems may be impacted. How big an area? What lives there? What lives downstream, etc.?
- Activities- talk about activities that will be impeded, like traffic jams or business near the tracks.

Include any background that you can, things like the population in the area that you are discussing, references you have available, photos and maps, etc. But don't be paralyzed if you don't have access to all of this information. Your job is to make the case that this impact should be studied, not provide them with the results of an already completed study.

What issues should I bring up?

Of course the goal in recruiting many comments is that additional ideas and perspectives are included. The list below should be a jumping off point, but is not comprehensive. You can add details, specifics of these impacts on your neighborhood or area, or you can discuss something completely different.

1. **Oil train spills, derailments, leaks and explosions** - Agencies should consider each of these risks for every unique place along the rail corridor: bridges, centers of commerce, places where people gather, important habitat or unique ecosystems, critical areas, etc. Take a look at www.blast-zone.org to see where these trains are and will be running.
2. **Health Impacts from oil trains** - air quality and noise impacts along the rail corridor are also concerns. [Washington Physicians for Social Responsibility](#) have compiled research documenting these impacts. Round this out by talking about the schools, offices, parks, neighborhoods that will be subject to these impacts.
3. **Wetland clearing and mitigation** - Shell proposes to clear 32 acres of wetlands and saltwater marshes and their proposed mitigations are outside the watershed. The scope of the EIS should include impacts on all species that rely on the wetlands and the general health of the Padilla Bay watershed. Comments discussing the details of these potential impacts will be particularly helpful.
4. **Environmental Justice** - because of the location of the rail lines, many of the impacts from oil trains fall disproportionately on low income communities and people of color. Anywhere that is the case, it should be highlighted.

5. **Traffic impacts** - Blocked intersections are a major problem for communities facing increases in oil train traffic. Help us discuss these impacts and what they look like for the community you live in? Do you live on the same side of the railroad tracks as the hospital or the nearest fire station? What happens when traffic backs up for ten minutes during rush hour? Long lines of stopped cars, backed up onto a freeway off ramp or through other intersections can be a safety hazard.
6. **Economic Impacts** - time is money and mile-long trains blocking downtown centers for 5-10 minutes at a time can add up. Have you had customers tell you they couldn't get to your business because of a blocked intersection? Or employees who were late to work? Or delayed appointments? Also consider how noise, pollution and risk factor into property valuations.
7. **Greenhouse gases** - The crude being carried on these trains is fundamentally different from the feedstock that this refinery has relied on in the past. Bakken crude comes from hydraulic fracturing which among other things, results in methane leaks. Tar sands require huge amounts of energy to extract. These upstream greenhouse gases should be considered. Your comments can also include the likely impacts of global climate change and particularly those impacts in Washington state.
8. **Refinery Worker safety** - tar sands feedstocks are known to be more corrosive and may subject workers to increased risk of a refinery accident. Also, Shell has not committed to employing United Steel Worker's union members at the offloading facility itself. USW provides additional training and workplace protections that contract workers might not benefit from - potentially increasing the risk of an accident and decreasing the likelihood that hazards will be observed and reported. If a union worker observes a hazard and takes action to solve the problem, including stopping work, they have contractual protections against employer retaliation.
9. **Marine Vessel Traffic and Arctic feedstocks** - Shell claims that they will substitute oil from trains for oil from ships. But other another Shell [document](#) (page 9) suggests that they plan to bring oil from the Arctic to Puget Sound. These conflicting promises leave a lot of uncertainty about possible impacts. Any loopholes in the permit could allow Shell to increase vessel traffic. Discussion of marine vessel spill impacts and risks, damage to the ecosystems and impacts should be included in scoping comments. Proposed mitigations or alternatives could include ongoing, long-term monitoring and oversight of Shell's operations to ensure reductions in vessel traffic.
10. **Habitat and Endangered Species** - the proposed project and the rail lines potentially impact numerous significant or endangered species. Details about the lifecycle, physiology or behavior patterns of these species will be important to consider. Please

comment with any observations that you have made about any species on or near the project site, or along or near the rail corridor.

What about Mitigation?

The agencies are expected to use the EIS to explore reasonable alternatives and mitigation measures.

Suggesting alternatives or mitigation is an optional component for scoping comments. Could the project be conducted in a different way that would reduce the impact that you are describing? If so, suggesting the improvement will strengthen your comment. If the impact cannot be mitigated, stating that it cannot be mitigated will also strengthen your comment.

You can also request a “no action alternative” which allows the agencies to compare the impacts of the project to doing nothing at all.

What about cumulative impacts?

You can request that the impact you are discussing should be considered in the context of cumulative impacts. Cumulative Impacts are caused by the incremental impact of the action added to other past, present, and reasonably foreseeable future actions regardless of what action or activity undertook those actions. One example would be risks and impacts of train traffic from this project as well as oil trains heading to other refineries and proposed coal train traffic as well.

Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. The cumulative effects of an action may be undetectable when viewed in the individual context of direct and even secondary impacts, but nonetheless can add to other disturbances and eventually lead to a measurable environmental change.

Ok, done! So how do I send them in?

To comment by email: comment@shellraileis.com

Or attend a hearing. Speakers will be selected at random and will have two minutes.

- Mount Vernon: Tue., Oct. 13, Best Western Plus, 2300 Market St., 4-8 p.m.
- Anacortes: Wed., Oct. 14, Anacortes Middle School, 2202 M Ave, 4-8 p.m.
- Lynnwood: Mon., Oct. 19, Lynnwood Convention Center, 3711 196th St. SW, 4-8 p.m.

Or you can mail it, or leave them a voicemail or drop it off in person. Details here:

<http://shellraileis.publicmeeting.info/comment>