

## ENVIRONMENTAL CHECKLIST

### *Purpose of checklist:*

The State Environmental Policy Act (SEPA), chapter [43.21C](#) RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

### *Instructions for applicants:*

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

### *Use of checklist for nonproject proposals:*

Complete this checklist for nonproject proposals, even though questions may be answered "does not apply." IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

## A. BACKGROUND

1. Name of proposed project, if applicable: BP Cherry Point Cogeneration Project
2. Name of applicant: BP West Coast Products LLC

**3. Address and phone number of applicant and contact person:**

Mark Moore  
4519 Grandview Road, Blaine, WA 98230  
(360) 371-1200

**4. Date checklist prepared:** June 20, 2006

**5. Agency requesting checklist:** EFSEC

**6. Proposed timing or schedule (including phasing, if applicable):**

BP proposes to commence construction of the Cogeneration Project within the term of the existing Site Certification Agreement (SCA), which requires construction to commence by December 21, 2014. As explained below, BP is requesting an amendment to the SCA that would allow it to construct the project in two phases.

**7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

BP is requesting an amendment to the SCA to allow it to construct the facility in two phases. If BP proceeds with phased construction, there would be a Phase I facility, and that facility might be expanded in a later second phase. At this time, BP does not have other plans for additions, expansion or further activity beyond Phase I related to the Cogeneration Project proposal.

**8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

Final Environmental Impact Statement, BP Cherry Point Cogeneration Project (Aug. 2004), hereafter "FEIS".  
Application for Site Certification (Revised Apr. 2003)

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. No**

**10. List any government approvals or permits that will be needed for your proposal, if known.**

Amendment of Site Certification Agreement (SCA).  
Amendment of Prevention of Significant Deterioration/Notice of Construction (PSD) Permit.

**11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

BP already possesses a Site Certification Agreement (SCA) and related permits that authorize the construction and operation of a 720 MW (738 MW gross) natural gas-fired cogeneration facility known as the Cherry Point Cogeneration Project. BP now seeks to amend the existing SCA and associated PSD Permit so that BP will have the flexibility of either proceeding to construct the Cogeneration Project as originally permitted, or being able to construct it in two phases.

Under the phased construction alternative, Phase I would consist of a combined-cycle cogeneration facility with two combustion turbine generators, two heat recovery steam generators with duct firing capability and one steam turbine generator. Phase I would have a gross electrical capacity of 520-570 MW, depending upon whether General Electric 7FA or Siemens SGT6-5000F combustion turbines were used. Phase II would consist of unspecified modifications and additions to the facility that would increase its capacity to no more than 720 MW (738 MW gross). Under the phased construction alternative, both phases of the facility would be designed to fit on the same footprint as the originally permitted facility and to have environmental impacts when fully constructed that are not substantially greater than the single-phased project that is authorized by the existing SCA. A detailed description of the phased construction alternative is being filed with this Checklist.

BP is also requesting the following changes in the SCA:

- (a) an amendment allowing BP to use refinery fuel gas in the duct burners on the HRSGs;
- (b) an amendment allowing project construction to occur over a 33-month period rather than a 27-month period;
- (c) a change in the description of the Ferndale Pipeline facility that will provide natural gas to the Project;
- (d) an amendment to allow BP to use aqueous rather than anhydrous ammonia at the Project; and
- (e) an amendment so that the International Building Code of 2003 (IBC-2003) rather than the Uniform Building Code of 1997 (UBC-1997) will govern construction of the Project.

**12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The project will be located on the south side of Grandview Road adjacent to the existing BP Cherry Point refinery in Whatcom County, Washington. The project site is described in the FEIS and the legal description is attached to the existing SCA. Whether constructed at once or in phases, the Cogeneration Project would occupy the same site and have the same overall footprint.

TO BE COMPLETED BY  
APPLICANT

EVALUATION FOR  
AGENCY USE  
ONLY

**B. ENVIRONMENTAL ELEMENTS**

**1. Earth**

**a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other  
.....**

A detailed description of the site is provided in the FEIS.

**b. What is the steepest slope on the site (approximate percent slope)?**

See FEIS.

**c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)?  
If you know the classification of agricultural soils, specify them and note any prime farmland.**

See FEIS

**d. Are there surface indications or history of unstable soils in the immediate vicinity? If so,  
describe.**

See FEIS

**e. Describe the purpose, type, and approximate quantities of any filling or grading proposed.  
Indicate source of fill.**

See FEIS

**f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.**

A detailed analysis of potential environmental effects associated with constructing and operating the facility is provided in the FEIS. The phased construction alternative would not change the footprint of the facility and would be subject to the same SCA conditions to minimize erosion. As a result, the phased construction alternative is not expected to result in additional erosion. The other changes to the SCA

requested by BP would not result in erosion.

**g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

See FEIS. The phased construction alternative will be designed to occupy the same footprint and will not change the amount of impervious surfaces at the site.

**h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:**

See FEIS.

**2. Air**

**a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.**

Air emissions during construction of the Cogeneration Project are described in the FEIS. Neither the impacts nor mitigation measures for construction would change for the phased construction alternative.

Operational emissions would differ for the phased construction alternative. With only the Phase I Facility in operation, emissions would be lower than authorized by the original PSD permit. However, maximum potential VOC emissions could be higher than originally permitted because the Phase I facility will require additional duct-firing capabilities to ensure that it will be able to meet refinery steam demand.

Phase I emission rates and modeling analysis are presented in the application for a PSD amendment. The following table summarizes the Phase I facility's potential to emit criteria pollutants:

Potential to Emit (Tons per year)	NOx	CO	VOC	PM10	SO2
Authorized Facility	234.4	159	42	262.2	51
Phase I Facility (with GE)	201.4	158.4	58.4	262.0	46.7
Phase I Facility (with Siemens)	220.3	101.6	57.2	193.8	51.1

The following table indicates the modeled impact on ambient air quality compared to the significant impact levels (SILs) for Class II Areas.

Pollutant	Maximum Predicted Concentration (ug/m <sup>3</sup> ) <sup>1</sup>					SIL (ug/m <sup>3</sup> ) <sup>2</sup>
	Annual <sup>3</sup>	24-hr	8-hr	3-hr	1-hr	
NO <sub>x</sub> (GE)	0.80					1
NO <sub>x</sub> (GE/Alternate STG)	0.63					1
NO <sub>x</sub> (Siemens)	0.77					1
CO (GE)			10.9		83.0	500/2,000
PM <sub>10</sub> (GE)	0.55	3.86				1/5
PM <sub>10</sub> (GE/Alternate STG)	0.54	3.99				1/5
PM <sub>10</sub> (Siemens)		3.79				1/5
SO <sub>2</sub> (GE)	0.06	0.8		5.0		1/5/25

Notes  
<sup>1</sup> Highest of all cases for 1995, 1996, 1998, 1999, 2000.  
<sup>2</sup> Significant Impact Level (SIL) for criteria pollutants.  
<sup>3</sup> Based on annual average ambient temperature of 50°F.

The following table shows how the combination of existing concentrations of regulated pollutants and the modeled impacts of the Phase I facility compare to national ambient air quality standards (NAAQS).

Pollutant	Averaging Time	Maximum Concentration (ug/m <sup>3</sup> )			Lower of WAAQS or NAAQS (ug/m <sup>3</sup> )
		Modeled	Background	Total	
SO <sub>2</sub>	Annual	0.06	3	3	53
	24-hour	0.8	13	14	260
	3-hour	5.0	27	32	1,300
	1-hour	8.7	35	44	1,065
PM <sub>10</sub>	Annual	0.55	13	14	50
	24-hour	4.0	35	39	150
PM <sub>2.5</sub>	Annual	0.55	9	10	15
	24-hour	4.0	29	33	65
CO	8-hour	10.9	2,668	2,679	10,000
	1-hour	83.0	2,900	2,983	40,000
NO <sub>2</sub>	Annual	0.80	27	28	100

Background concentration is the maximum value for each pollutant and averaging time of the two nearest representative ambient measuring stations.

The Cogeneration Project will also emit carbon dioxide (CO<sub>2</sub>), which is not regulated by the Clean Air Act, but is a greenhouse gas. CO<sub>2</sub> emissions are directly related to the quantity of natural gas burned. The potential CO<sub>2</sub> emission from the Phase I facility would be 1,550 - 1,770 Ktonnes per year, depending upon the turbines selected, compared to approximately 2,016 Ktonnes per year for the previously permitted facility. The SCA requires mitigation of the facility's actual CO<sub>2</sub> emissions.

The Phase II facility is not yet sufficiently defined to provide air emission information. The requested SCA amendment would authorize construction of a Phase II facility only to the extent that the total emissions would not exceed those authorized by the original permit, with the exception of the increased VOC emissions described above.

BP is also asking to be allowed to burn refinery fuel gas in the HRSG duct burners. The fuel gas would be treated to have the same sulfur levels as natural gas. The facility would comply with the same emissions limits whether the duct burners were operated with natural gas or refinery fuel gas.

**b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

No.

**c. Proposed measures to reduce or control emissions or other impacts to air, if any:**

The two-phased alternative would employ the same emission control technology planned for the permitted facility. See FEIS and PSD amendment application.

**3. Water**

**a. Surface:**

**1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

See FEIS.

**2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

No.

**3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

See FEIS, Application for Site Certification and existing section 404 permit from Corps of Engineers. The two-phased alternative would not change the impacts to wetlands that has been permitted or the approved wetland mitigation plan.

**4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.**

No. Water for the phased construction alternative will be provided in the same way as the permitted project. The Phase I facility is expected to use an average of 1,700-2,000 gpm of water, compared to an average of 2,244-2,316 gpm of water for the previously permitted facility. As a result, additional water will be conserved by the planned water reuse project. Water use when both phases are constructed will be less than or equal to the water use authorized by the Site Certification Agreement.

**5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

No.

**6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

Waste water will be discharged to the Refinery's waste water treatment facility. With both phases of the phased construction alternative in operation, the quantity of waste water discharged will not exceed that authorized by the existing SCA.

**b. Ground:**

**1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.**

See FEIS.

**2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

See FEIS.

**c. Water runoff (including stormwater):**

**1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

The stormwater system is described in the original application for Site Certification and the FEIS. The phased construction alternative would not change the stormwater system design.

**2) Could waste materials enter ground or surface waters? If so, generally describe.**

See FEIS

**d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:**

See Application for Site Certification and FEIS,

**4. Plants**

**a. Check or circle types of vegetation found on the site: See FEIS**

- Deciduous tree: Alder, maple, aspen, other
- Evergreen tree: Fir, cedar, pine, other
- Shrubs
- Grass
- Pasture
- Crop or grain
- Wet soil plants: Cattail, buttercup, bullrush, skunk cabbage, other
- Water plants: Water lily, eelgrass, milfoil, other
- Other types of vegetation

**b. What kind and amount of vegetation will be removed or altered?**

The requested amendment will not result in any additional removal of vegetation. The project footprint would not change. See FEIS for a discussion of impacts associated with permitted project.

**c. List threatened or endangered species known to be on or near the site.**

See FEIS.

**d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:**

See FEIS. The proposed amendment would not change landscaping and mitigation requirements.

**5. Animals**

**a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site: See FEIS.**

**Birds: Hawk, heron, eagle, songbirds, other: . . . . .**

**Mammals: Deer, bear, elk, beaver, other: . . . . .**

**Fish: Bass, salmon, trout, herring, shellfish, other: . . . . .**

**b. List any threatened or endangered species known to be on or near the site.**

See FEIS

**c. Is the site part of a migration route? If so, explain.**

See FEIS

**d. Proposed measures to preserve or enhance wildlife, if any:**

The proposed amendment would not change the footprint of the project, and would remain subject to the conditions of the original SCA. No additional wildlife impacts are anticipated.

**6. Energy and natural resources**

**a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

The original SCA provided that natural gas would be the only fuel used at the Cogeneration Project. BP is now requesting that it be allowed to use refinery fuel gas in the facility's duct burners. The fuel gas would be treated so that it has the same sulfur levels as natural gas. The facility will comply with the same air emissions limitations whether the duct burners are fired with natural gas or fuel gas.

The maximum gas usage for the original facility was estimated at approximately 42,500,000 MMBtu/year, assuming a 94% availability of the Cogeneration Project and 510 Mlb/hr steam export to the refinery. Using the same assumptions, the maximum gas usage of the Phase I facility would be about 30,500,000 – 34,000,000 MMBtu/year depending upon the turbines used.

**b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

No

**c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:**

By producing both electricity and steam, the Cogeneration Project maximizes the use of combustion energy from the natural gas. It will operate at an overall combined efficiency of 63% compared to the 53% efficiency of a comparable combined-cycle generating facility. The Phase I facility will also operate as a cogeneration facility, with its efficiency benefits.

The existing SCA also requires BP to develop and implement a construction materials reuse plan. This requirement will apply regardless of whether the facility is constructed as originally permitted, or constructed in phases.

**7. Environmental health**

**a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.**

See FEIS. The proposed phased construction alternative would not change the chemicals used in construction or operation of the facility, and the facility would remain subject to risk prevention and mitigation conditions found in the SCA, whether constructed in phases or not.

**1) Describe special emergency services that might be required.**

See FEIS

**2) Proposed measures to reduce or control environmental health hazards, if any:**

See FEIS

**b. Noise**

**1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

Background noise conditions are described in the FEIS.

**2) What types and levels of noise would be created by or associated with the project on a**

**short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.**

Potential noise from Project was described and modeled in connection with the original permitting proceedings. Operation of the smaller Phase I facility may produce less noise than the originally permitted facility. BP proposes to remain subject to the existing SCA limitations on project noise under the phased construction alternative. Consequently, the requested amendment will not result in any additional noise impacts.

**3) Proposed measures to reduce or control noise impacts, if any:**

The SCA requires certain mitigation measures to be taken to reduce noise during construction, and contains limitations on noise from the Project. BP proposes that these mitigation measures and noise limitations apply to the phase construction alternative.

**8. Land and shoreline use**

**a. What is the current use of the site and adjacent properties?**

See FEIS.

**b. Has the site been used for agriculture? If so, describe.**

See FEIS.

**c. Describe any structures on the site.**

See FEIS

**d. Will any structures be demolished? If so, what?**

See FEIS

**e. What is the current zoning classification of the site?**

Heavy Impact Industrial.

**f. What is the current comprehensive plan designation of the site?**

Major/Port Industrial Growth Area with the Cherry Point Urban Growth Area.

**g. If applicable, what is the current shoreline master program designation of the site?**

n/a

**h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.**

The project site includes wetlands. The requested amendment will not change the footprint of the facility and, therefore, will not result in additional wetland impacts. BP proposes no changes to the wetland mitigation plan that has been approved by both the Corps of Engineers and EFSEC.

**i. Approximately how many people would reside or work in the completed project?**

BP estimated that operation of the originally permitted project would employ approximately 30 people. Operation of the Phase I facility is expected to employ the same number of people.

**j. Approximately how many people would the completed project employ?**

Approximately 30.

**k. Proposed measures to avoid or reduce displacement impacts, if any:**

None.

**l. Proposed measures to ensure the proposal is compatible with existing and projected land**

**uses and plans, if any:**

Whether or not it is built in phases, the Cogeneration Project will be compatible with the existing heavy industrial uses in the area. The Project site is a sufficient distance from residences to avoid interfering with residential uses.

**9. Housing**

**a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

The Cogeneration Project, whether constructed at once or in phases, would not provide any housing.

**b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

The Cogeneration Project, whether constructed at once or in phases would not eliminate any housing.

**c. Proposed measures to reduce or control housing impacts, if any:**

The requested amendment is not expected to result in any impacts on housing.

**10. Aesthetics**

**a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

The previously permitted Cogeneration Project would have three 150-foot exhaust stacks, three HRSG structures 95 feet tall and a cooling tower 60 feet tall. Under the alternative phased construction, the Phase I facility would have two 150-foot exhaust stacks, two HRSG structures 95 feet tall, and a cooling tower 60 feet tall.

**b. What views in the immediate vicinity would be altered or obstructed?**

The FEIS discusses the impact of the previously permitted facility on views in the vicinity. The phased construction alternative will not change the impact on views. By itself, the Phase I facility would have two gas turbines and HRSGs compared to three of each in the originally permitted project. The overall impact on views is not expected to be materially different.

**c. Proposed measures to reduce or control aesthetic impacts, if any:**

The SCA includes certain requirements to minimize aesthetic impacts; these requirements would apply to the proposed phased construction alternative as well.

**11. Light and glare**

**a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

See FEIS. The requested SCA amendment authorizing phased construction would not result in additional light or glare impacts.

**b. Could light or glare from the finished project be a safety hazard or interfere with views?**

No. See FEIS.

**c. What existing off-site sources of light or glare may affect your proposal?**

None.

**d. Proposed measures to reduce or control light and glare impacts, if any:**

The SCA includes certain requirements to minimize light and glare impacts; these requirements would apply to the proposed phase construction alternative as well.

**12. Recreation**

- a. What designated and informal recreational opportunities are in the immediate vicinity?**

See FEIS.

- b. Would the proposed project displace any existing recreational uses? If so, describe.**

No.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

None.

**13. Historic and cultural preservation**

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.**

See FEIS.

- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.**

See FEIS.

- c. Proposed measures to reduce or control impacts, if any:**

The phased construction alternative would not result any additional impacts to historic and cultural resources because its footprint would be the same as originally authorized. The SCA contains requirements designed to protect historic and cultural resources, and these SCA requirements would apply whether the project is constructed at once or in phases.

**14. Transportation**

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.**

See FEIS.

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?**

See FEIS.

- c. How many parking spaces would the completed project have? How many would the project eliminate?**

See FEIS.

- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).**

The SCA requires some improvements to Grandview Road at the Portal Way and Blaine Road intersections in the vicinity of the project. These requirements would apply whether the project is constructed at once or in phases.

- e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

See FEIS.

**f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.**

Construction of the 720 MW Cogeneration Project as originally permitted was expected to take approximately 27 months, and construction related traffic would vary during that construction period. As described in the FEIS, peak construction traffic would involve approximately 600 round trips to the Project site.

BP is requesting to amend the SCA to allow construction to take place over a 33-month period. With a slightly longer construction period, fewer activities will need to take place simultaneously, which means fewer workers will be on site at any particular time. Traffic impacts are expected to be correspondingly lower.

Under the phased construction alternative, construction of the 520-570 MW Phase I facility would also take approximately 33 months. Although fewer construction person-hours would be required to complete Phase I, the overall schedule duration remains approximately the same. Because fewer workers will be required on site, project-related traffic would be reduced. Fewer heavy equipment hauls would be required during Phase I because only two gas turbines and HRSGs would be constructed.

**g. Proposed measures to reduce or control transportation impacts, if any:**

In order to mitigate potential impacts on traffic due to construction, the SCA requires BP to develop and implement a construction traffic management plan, construct a traffic signal at the intersection of Grandview Road and Portal Way, and implement approved temporary left-turn channelization at the intersection of Grandview Road and Blaine Road. These measures will also mitigate traffic impacts associated with the phased construction alternative.

**15. Public services**

**a. Would the project result in an increased need for public services (for example: Fire protection, police protection, health care, schools, other)? If so, generally describe.**

The requested SCA amendment is not expected to result in any increased need for public services. In fact, the lower level of construction activity during phased construction is likely to reduce the need for these services.

**b. Proposed measures to reduce or control direct impacts on public services, if any.**

The SCA already requires the development and implementation of a Construction Emergency Plan, and coordination with local police, fire and emergency medical services. It also requires BP to pay reasonable costs if unanticipated services result in additional overtime for the Whatcom County Sheriff's Department. These requirements would apply regardless of whether the Project is constructed at once or in phases.

**16. Utilities**

**a. Circle utilities currently available at the site: Electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.**

See FEIS.

**b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.**

See FEIS.

**C. SIGNATURE**

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

**Signature:**

A handwritten signature in black ink, appearing to read "Mark S. Moore", is written above a solid horizontal line.

Mark S. Moore

**Date Submitted:** June 20, 2006