

Scoping Report

Tesoro Savage Vancouver Energy
Distribution Terminal

Application No. 2013-01

Docket No. EF-131590

Washington State Energy Facility Site Evaluation Council

February 2014



Image courtesy of Port of Vancouver USA

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for
Washington State Energy Facility Site Evaluation Council

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* Appendices provided electronically at end of report.

Acronyms

APE	Area of Potential Effect
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
DS	Determination of Significance
EFSEC	Energy Facility Site Evaluation Council
EIS	Environmental Impact Statement
NGT	National Geologic Trail
NHP	National Historical Park
NHS	National Historic Site
NHT	National Historic Trail
NP	National Park
SEPA	State Environmental Policy Act
WDNR	Washington Department of Natural Resources

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1 Introduction

1.1 Project Background

On August 29, 2013, Tesoro Savage Petroleum Terminal LLC (Applicant) submitted an application for a Site Certification Agreement to the Washington State Energy Facility Site Evaluation Council (EFSEC) to construct and operate the Tesoro Savage Vancouver Energy Distribution Terminal, Application No. 2013-01, Docket No. EF-131590 (Project) at the Port of Vancouver in Vancouver, Washington. At full operation the project would be capable of receiving up to 360,000 barrels of crude oil per day transported by up to four unit trains. Each unit train would be comprised of more than 100 tanker cars and up to three locomotives. The oil would be temporarily stored on site prior to being loaded onto marine vessels for delivery to refineries on the west coast of the United States (California, Washington and Alaska). The project area at the terminal site encompasses 44.9 acres, located primarily in the northern portion of the Port. The Project is comprised of three main areas: a rail unloading facility, an oil storage area, and a marine terminal. Two new rail loops would be added to the existing rail infrastructure and approximately 38,500 linear feet of pipeline would be constructed to move the crude oil between these three areas. Additional project components include six 48-foot tall, 240-foot diameter crude oil storage tanks with a working capacity of approximately 340,000 barrels each.

The complete Application for Site Certification and other relevant materials are available for public review at the EFSEC office, Washington State Library and libraries close to the Project site as well as on the EFSEC website at www.efsec.wa.gov.

1.2 SEPA Environmental Review

EFSEC has determined that the proposed project may have a probable significant adverse impact on the environment. As SEPA lead agency, EFSEC is preparing an Environmental Impact Statement (EIS) pursuant to requirements and procedures set forth in Chapter 43.21C RCW, WAC 463-47-090, and WAC 197-11. EFSEC issued a Determination of Significance (DS) and public scoping notice on October 3, 2013 to begin SEPA environmental review. EFSEC reissued the DS and public scoping notice on November 8, 2013, announcing a second scoping meeting and extending the deadline for receiving written scoping comments from November 18, 2013 to December 18, 2013. Copies of these notices are included in Appendix A and the scoping meeting materials including handouts and comment forms are included in Appendix B.

1.3 EIS Scoping Process

Scoping is the first step in the SEPA environmental review process. The term “scoping” refers to the act of identifying issues and concerns related to the proposed action. Because an EIS is only required to analyze potentially significant environmental impacts, scoping is a way to narrow the focus of the EIS to the significant issues of concern important to the public and other agencies (WAC 197-11-793). Because scoping helps identify key issues of concern early in the SEPA process, it provides the applicant an opportunity to modify a proposed project to address those concerns and possibly reduce environmental impacts¹.

Members of the public, government agencies, and tribes were provided opportunities to submit scoping comments in several ways, including verbal comments that were recorded by a court reporter at public

¹ State Environmental Policy Act Handbook, Washington State Department of Ecology, Publication # 98-114, September 1998, Updated 2003, SEPA Unit, Department of Ecology.

scoping meetings (described below); comment forms distributed and collected at the scoping meetings; and, written comments submitted by e-mail, the U.S. Postal Service, or hand delivered to the EFSEC office in Olympia, Washington.

Each comment letter, e-mail, or comment form was assigned a docket number (i.e., a tracking number unique to this Project) and a unique scoping comment number prior to being digitally scanned and entered into an electronic database. Electronic copies of each comment were then posted to the EFSEC website. Transcripts documenting the verbal comments received at the two public scoping meetings were also digitally scanned, entered into the database, and posted to the EFSEC website.

The content of each comment letter, e-mail, or comment form was then reviewed to identify discrete issues of concern and suggestions regarding the scope of the EIS. Each discrete issue of concern or suggestion on the scope of the EIS was then assigned an issue code that corresponds to one or more elements of the environment listed in WAC 197-11-444. Issue codes were then grouped into general issue categories for presentation in the summary tables and figures (See Appendix D for the list of issue categories and codes).

1.4 Scoping Report

This report summarizes and analyzes 31,074 comments received from private citizens, environmental organizations, public agencies, and tribal representatives during the scoping period. Of the comments received, the majority comprised of form letters, although many of the form letters also contained additional comments that were coded and summarized as discrete issues (Figure 1).

Section 2 of this report describes the type and number of scoping comments received at the public scoping meetings held in Vancouver and Spokane. Section 3 focuses on scoping comments received from public agencies, tribes, and other officials. Section 4 summarizes the type and number of written comments received during the comment period.

All of the comments identified in this report are under review by EFSEC to help inform the breadth and range of considerations to be addressed in the EIS. EFSEC will be making a determination on the scope of the EIS in the near future.

2 Public Meetings

Two official SEPA scoping meetings were held during the evenings of October 29, 2013 and December 11, 2013. The October 29, 2013 meeting was held at the Gaiser Student Center of Clark College in Vancouver, Washington. The December 11, 2013 meeting was held at the Center Place Regional Event Center in Spokane Valley, Washington. The EFSEC Chair and Council members participated in both meetings. Introductory comments were made by the EFSEC Chair and EFSEC staff, describing, the purpose of the public scoping meeting, summary of the SEPA process, and the roles of EFSEC and the Applicant during the environmental review process.

Members of the public who wished to provide verbal comments were asked to register and comments were received and recorded. Comments were recorded electronically and transcribed on-location by a licensed court reporter. The Vancouver scoping meeting was attended by 320 people providing 70 verbal comments and the Spokane scoping meeting was attended by 54 people providing 35 comments. The comments are summarized for the Vancouver and Spokane meetings separately.

Figures 2 and 3 illustrate the issues identified in the comments received at the Vancouver scoping meeting. Figure 2 shows the proportion of issues in each category as a percent of the total number of issues identified during the Vancouver scoping meeting. Figure 3 shows the number of issues received in each category with the geographic area of concern for each issue indicated. For example, if an issue

concerned impacts at the project site, it was coded as an issue related to on-site impacts (indicated in blue in the figure). If an issue was related to the operation of marine vessels or rail transportation, it was coded as an issue related to off-site impacts (indicated in red in the figure). If an issue category did not specify whether the concern was at a particular location, it was coded as 'non-site-specific' (indicated in green on the figure). At the Vancouver meeting, the greatest proportion of issues identified was categorized as 'general comments', where 31 comments were opposed to the project, and 5 were general or non-specific comments. Half of the total issues identified fell into the general comment, environmental health and safety, climate change, and cumulative effects categories. The issues in each category are described in more detail in Table 1.

Figures 4 and 5 illustrate the issues identified in the comments received at the Spokane scoping meeting. At this meeting, most of the concerns were related to transportation; specifically increased rail traffic along rail corridors away from the project site. Other issues categories representing more than ten percent of all identified issues include environmental health and safety, cumulative effects, and energy and natural resources. The issues in each category from the Spokane meeting are described in more detail in Table 2.

Copies of the official transcripts and attendance lists for both meetings are included in Appendix C and a description of the issue categories and issue codes used to analyze the comments are presented in Appendix D. A summary of the issues received at the two public meetings are presented in table format in Appendix F.

Percent of Comments by Comment Type

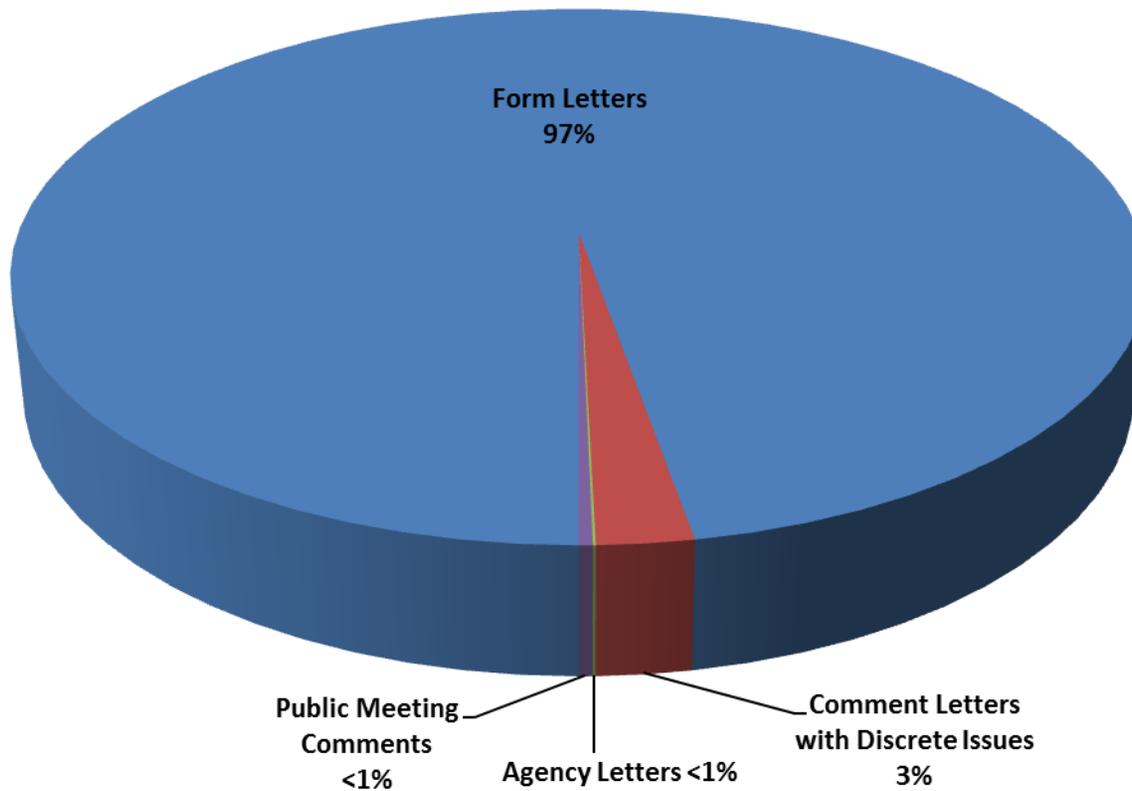


Figure 1: Percent of total comments received by comment type.

Percent of Issues By Category

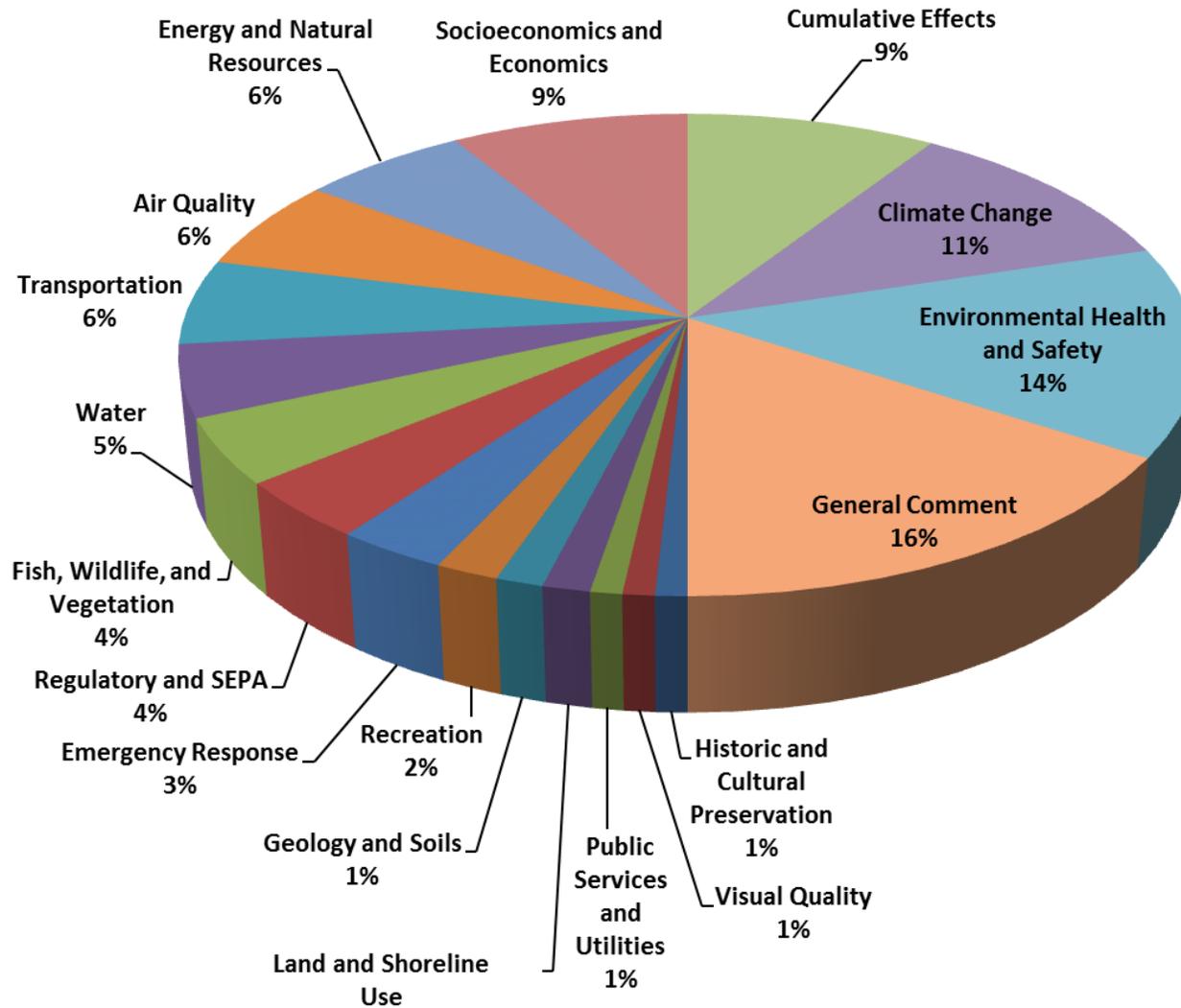


Figure 2: Percent of issues by category for comments received at the Vancouver scoping meeting.

Issues by Category and Geographic Area of Concern

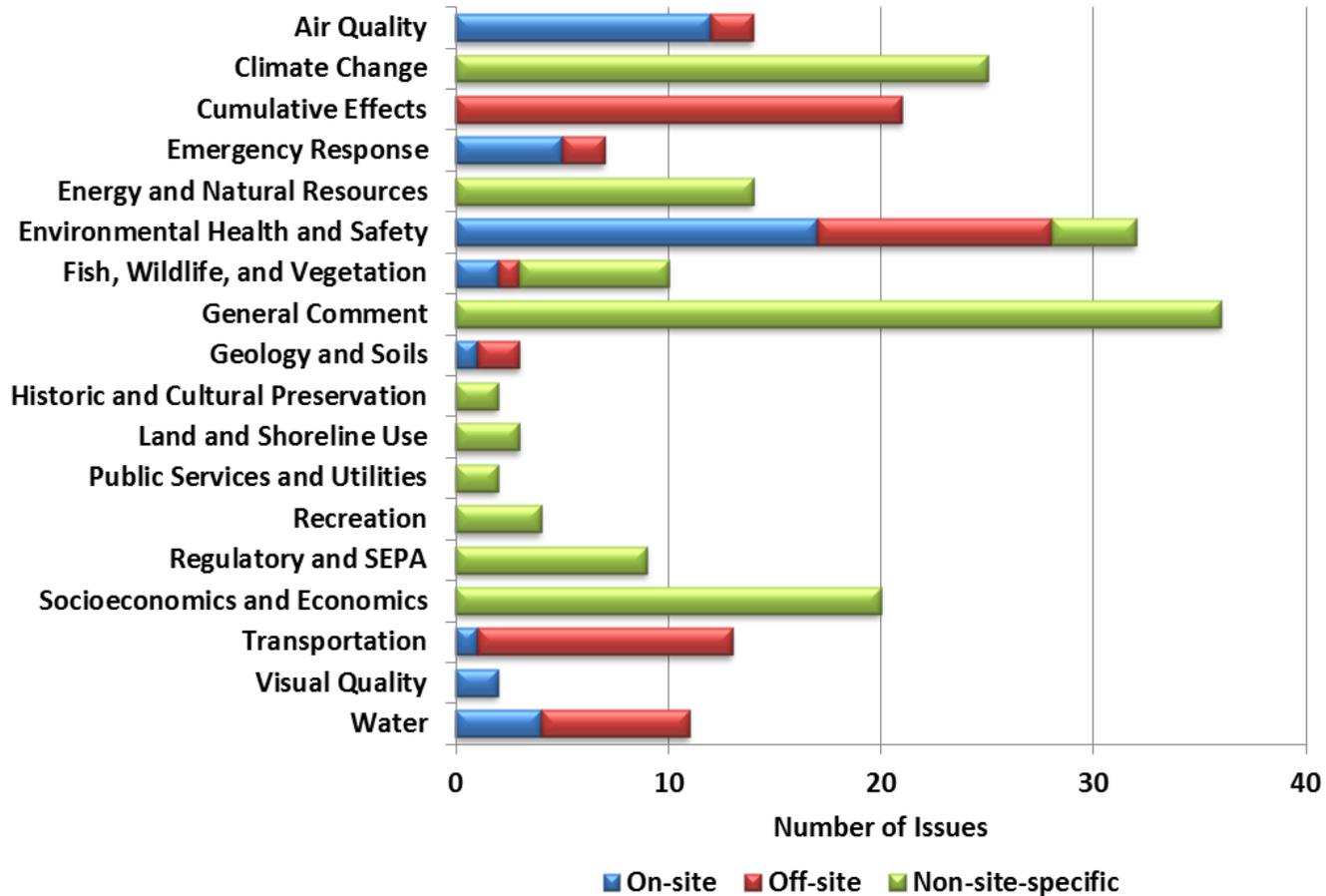


Figure 3: Number of issues by category and geographic area of concern for comments received at the Vancouver scoping meeting.

Percent of Issues By Category

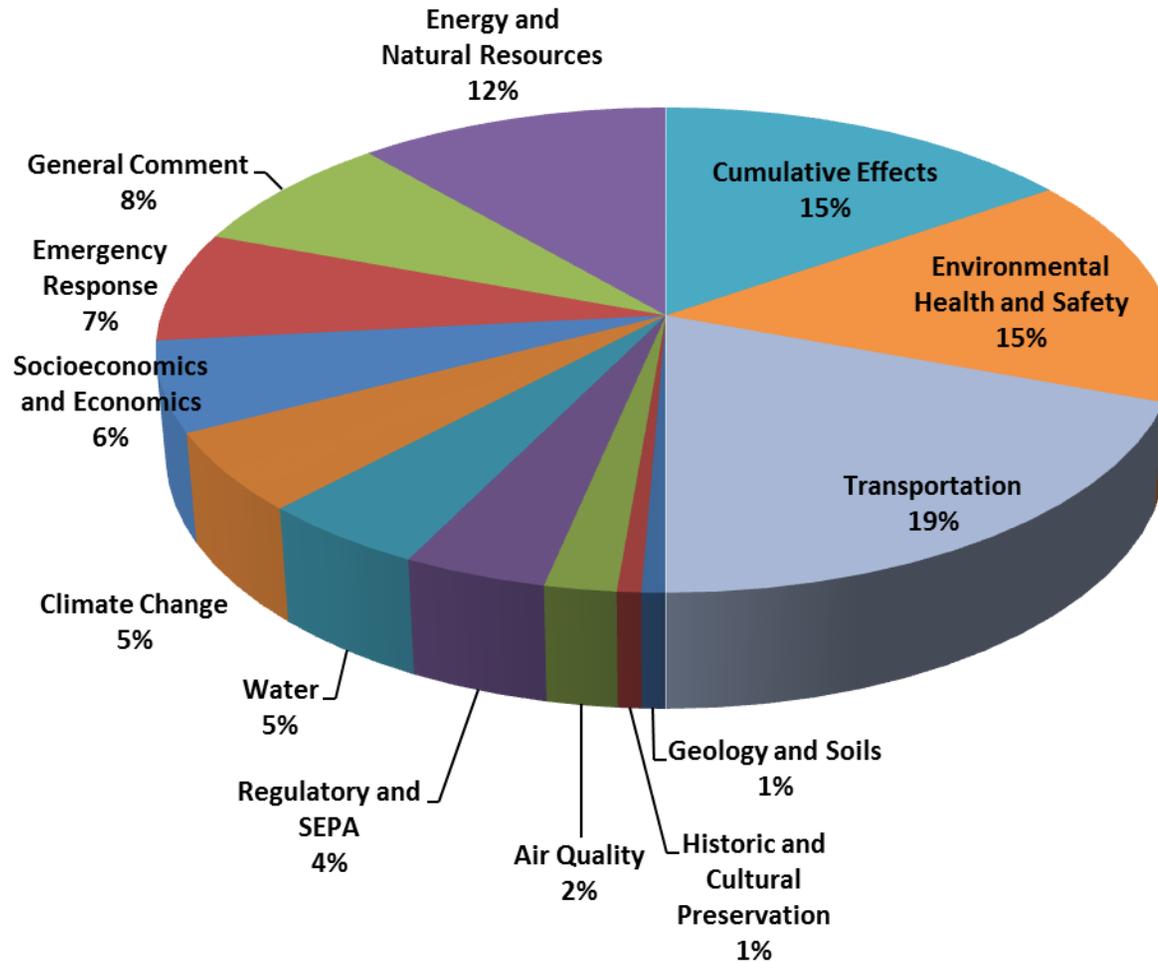


Figure 4: Percent of issues by issue category for comments received at the Spokane scoping meeting.

Issues by Category and Geographic Area of Concern

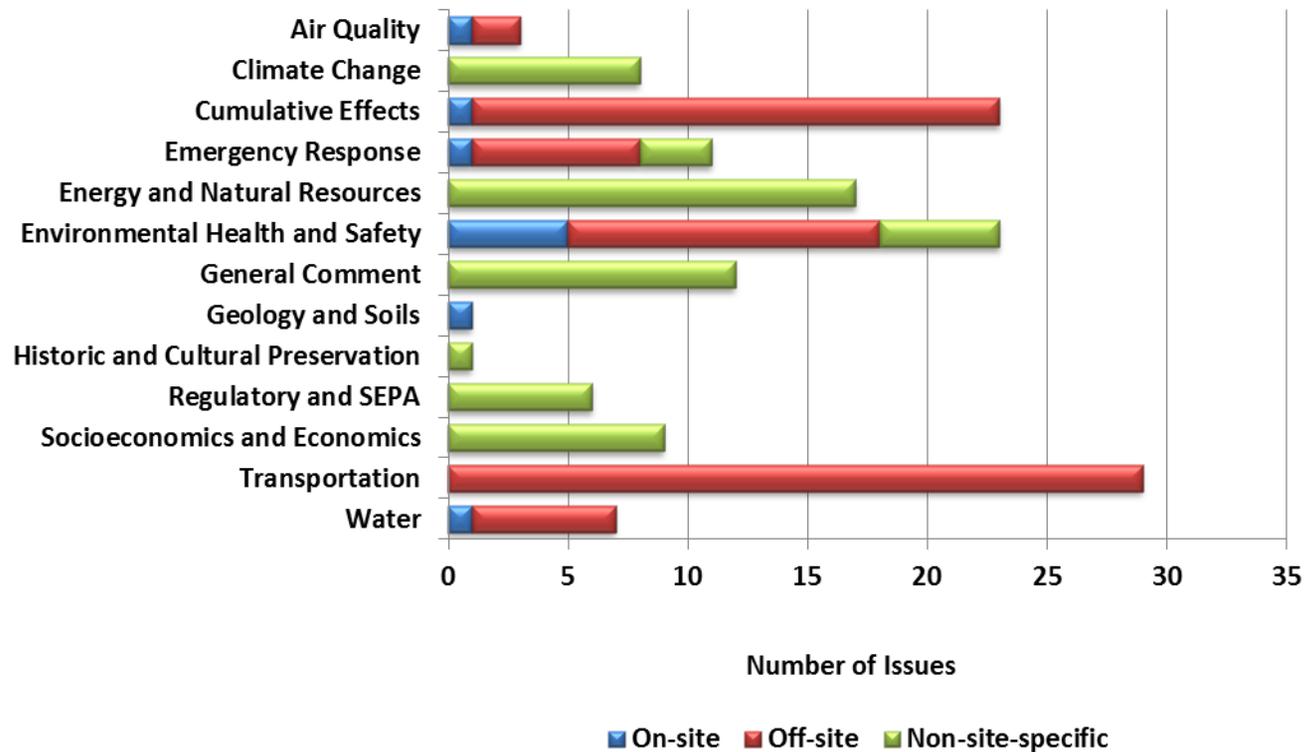


Figure 5: Number of issues by category and geographic area of concern for comments received at the Spokane scoping meeting.

Table 1: Summary of issues in comments received at the Vancouver scoping meeting

Issue	SEPA Topic	Number of Issues	Description
Air Quality	Air	14	12 issues concerning air emissions, dust, and odors from facility operations; including possible health effects from release of air toxics. 2 issues concerning exhaust emissions from marine vessels operating on the Columbia River or moored at the loading dock.
Climate Change	Air	24	24 issues requested consideration and analysis of effects on global climate change.
Cumulative Effects	Secondary and Cumulative Impacts	21	24 issues requested analysis of the cumulative impacts associated with other crude oil and coal terminal projects, including associated rail and marine operations.
Energy and Natural Resources	Energy and Natural Resources	14	14 issues focused on national energy policy, fossil fuels vs. renewable energy (wind, solar, biofuels), and energy conservation.
Environmental Health and Safety	Environmental Health	32	9 issues concerning the volatility of crude oil and the risk of fire and/or explosion at the project site (including security/terrorism concerns). 5 issues concerning the volatility of crude oil and the risk of fire and/or explosion along rail or marine transportation routes (including security/terrorism concerns). 6 issues focused on concerns about oil spills at the project site and the marine loading area. 4 issues focused on concerns about oil spills along rail and marine vessel transportation routes. 2 issues concerned about noise from plant operations. 2 issues concerned about noise along rail and marine transportation routes. 4 issues requesting the study of potential acute/chronic health effects from exposure to air toxics, particulates, and contaminated water due to normal operations and/or accidental releases or spills.
Emergency Responses	Public Services and Utilities	7	5 issues concerning the adequacy of existing emergency plans and the ability of the local police departments, fire departments, and emergency medical personnel to respond to major accidents that result in catastrophic oil spills, explosions, or fires at the project site or vessel loading area. 2 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, and emergency medical personnel to respond to derailments, collisions, other accidents that result in catastrophic oil spills, explosions, or fires along offsite rail transportation routes.

Issue	SEPA Topic	Number of Issues	Description
Fish, Wildlife, and Vegetation	Plants and Animals	10	<p>7 issues concerning impacts on fish, wildlife, and vegetation.</p> <p>2 issues concerning potential onsite impacts on fish, wildlife, vegetation, wetlands, threatened and endangered species from construction and operation of the proposed project, including habitat removal, introduction of exotic plants and invasive marine organisms; disturbance, displacement, and direct mortality from construction activities; and oil spills in upland areas or in the marine vessel loading area.</p> <p>1 issue concerning potential offsite impacts on fish, wildlife, vegetation, and threatened and endangered species from off-site train operations, including disturbance or direct mortality due to collisions, disruption of migration routes, and impacts from a limited or catastrophic oil spill and/or fire.</p>
General Comment	General Comments	36	<p>31 comments stating opposition to the proposed project.</p> <p>5 general, non-specific comments.</p>
Geology and Soils	Earth	3	<p>1 issue concerning onsite geology, soils, erosion, earthquakes, liquefaction, including the shoreline area.</p> <p>2 issues concerned with geologic conditions along rail or marine transportation routes.</p>
Historic and Cultural Preservation	Historic and Cultural Preservation	2	<p>2 issues concerned with impacts to archaeological resources, historic buildings, or tribal concerns.</p>
Land and Shoreline Use	Land and Shoreline Use	3	<p>3 issues concerning the compatibility of the proposed project with nearby residential land uses and the proposed Columbia Waterfront Development Project.</p>
Public Services and Utilities	Public Services and Utilities	2	<p>2 issues concerning the increased demands on public services (police, fire, emergency medical services) and public utilities (water, sewer, electricity) during normal plant operations.</p>
Recreation	Land and Shoreline Use	4	<p>4 issues concerning potential negative effects on local and regional recreational resources (i.e. parks, trails, and the Columbia River Gorge National Scenic Area).</p>
Regulatory and SEPA		9	<p>2 issues requesting consideration of reasonable alternatives to the proposed project, including consideration of alternative sites, alternative transportation</p>

Issue	SEPA Topic	Number of Issues	Description
			<p>routes, and alternative sources of energy</p> <p>1 issue regarding the purpose and need for the project.</p> <p>6 issues pertaining to federal, state, or local regulations, State Environmental Policy Act (SEPA) procedures or requirements, the Port of Vancouver lease agreement with Tesoro-Savage, or other legal concerns</p>
Socioeconomics & Economics	Population, Housing, Social Elements, Economics	20	20 issues concerning the negative impacts on property values, quality of life, attraction of new residents and businesses, and tourism.
Transportation	Transportation	13	<p>1 issue on potential impacts from plant construction and operation on local vehicular traffic and safety.</p> <p>12 issues focused on concerns over increased train traffic in the Vancouver metropolitan area and along major rail corridors in Washington State, including increased traffic delays and delays to emergency vehicles at railroad crossings, interference with the movement/circulation of people and goods, and increased risk of derailments and accidents.</p>
Visual Quality	Land and Shoreline Use	2	2 issues concerning the visual or aesthetic impacts of the new facility on existing views or vistas.
Water	Water	11	<p>4 issues concerning potential impacts on rivers, streams, ground water, and aquifers near the project site from limited or catastrophic oil spills.</p> <p>5 issues concerning potential impacts on the Columbia River and adjacent riparian waterways from limited or catastrophic oil spills.</p> <p>2 issues concerning potential impacts on rivers, streams, and aquifers located along major rail routes from limited or catastrophic oil spills.</p>

Table 2: Summary of issues in comments received at the Spokane scoping meeting

Issue	SEPA Topic	Number of Issues	Description
Air Quality	Air	3	<p>1 issue focused on air emissions, dust, and odors from facility operations; including possible health effects from release of air toxics.</p> <p>2 issues focused on exhaust emissions from marine vessels operating on the Columbia River or moored at the loading dock.</p>
Climate Change	Air	8	<p>8 issues requesting consideration and analysis of effects on global climate change.</p>
Cumulative Effects	Secondary and Cumulative Impacts	23	<p>6 issues requesting analysis of the cumulative impacts from other past, present, and reasonably foreseeable projects on the project site or in the project vicinity.</p> <p>17 issues requesting analysis of the cumulative impacts associated with other crude oil and coal terminal projects, including associated rail and marine operations.</p>
Energy and Natural Resources	Energy and Natural Resources	17	<p>17 issues focused on national energy policy, fossil fuels vs. renewable energy (wind, solar, biofuels), and energy conservation.</p>
Environmental Health and Safety	Environmental Health	23	<p>2 issues concerning the volatility of crude oil and the risk of fire and/or explosion at the project site (including security/terrorism concerns).</p> <p>6 issues concerning the volatility of crude oil and the risk of fire and/or explosion along rail or marine transportation routes (including security/terrorism concerns).</p> <p>2 issues focused on concerns about oil spills at the project site and the marine loading area.</p> <p>4 issues focused on concerns about oil spills along rail and marine vessel transportation routes.</p> <p>1 issue concerned about noise from plant operations.</p> <p>3 issues concerned about noise along rail and marine transportation routes.</p> <p>5 issues requesting the study of potential acute/chronic health effects from exposure to air toxics, particulates, and contaminated water due to normal operations and/or accidental releases or spills.</p>
Emergency Responses	Public Services and Utilities	11	<p>1 issue concerning the adequacy of existing emergency plans and the ability of the local police departments, fire departments, and emergency medical personnel to respond to major accidents that result in catastrophic oil spills, explosions, or fires at the project site or vessel loading area.</p> <p>6 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, and emergency medical personnel to respond to derailments, collisions, other accidents that result in</p>

Issue	SEPA Topic	Number of Issues	Description
			catastrophic oil spills, explosions, or fires along offsite rail transportation routes.
General Comment	General Comments	12	8 comments stating opposition to the proposed project. 3 comments stating support for the proposed project. 1 general, non-specific comment.
Geology and Soils	Earth	1	1 issue concerning onsite geology, soils, erosion, earthquakes, liquefaction, including the shoreline area.
Historic and Cultural Preservation	Historic and Cultural Preservation	1	1 issue concerned with impacts to archaeological resources, historic buildings, or tribal concerns.
Regulatory and SEPA		3	3 issues requesting consideration of reasonable alternatives to the proposed project, including consideration of alternative sites, alternative transportation routes, and alternative sources of energy
Socioeconomics & Economics	Population, Housing, Social Elements, Economics	9	6 issues concerning the positive impacts on jobs, economic growth, and local and state tax revenue 3 issues concerning the negative impacts on property values, quality of life, attraction of new residents and businesses, and tourism.
Transportation	Transportation	29	3 issues focused on concerns over increased numbers of oil tankers operating on the Columbia River, including the increased risk of ship collisions and groundings. 26 issues focused on concerns over increased train traffic in the Vancouver metropolitan area and along major rail corridors in Washington State, including increased traffic delays and delays to emergency vehicles at railroad crossings, interference with the movement/circulation of people and goods, and increased risk of derailments and accidents.
Water	Water	7	1 issue concerning potential impacts on rivers, streams, ground water, and aquifers near the project site from limited or catastrophic oil spills. 1 issue concerning potential impacts on the Columbia River and adjacent riparian waterways from limited or catastrophic oil spills. 5 issues concerning potential impacts on rivers, streams, and aquifers located along major rail routes from limited or catastrophic oil spills.

3 Comments Received from Agencies, Tribes, and Officials

During the scoping period, EFSEC received comment letters from government agencies, Tribal Nations and representative tribal organizations, cities, counties, and elected officials. A total of 22 comment letters were received and are located in Appendix E. Comments are summarized in this section, illustrated in Figures 6 and 7, and tabulated in Table 3. The four categories with the most comments included environmental health and safety (16 percent), transportation (16 percent), fish, wildlife, and vegetation (12 percent), and regulatory and SEPA issues (11 percent). The environmental health and safety and the fish, wildlife, and vegetation issues were split between on-site and off-site concerns, but transportation issues were dominated by concerns about increased rail and marine traffic (Figure 7). This group had the highest proportion of comments in the regulatory and SEPA category (11 percent) and the historic and cultural preservation category (5 percent).

Summary of Agency Comments:

Port of Vancouver

- The Port has invested in upgrades to the facility including infrastructure, the shipping channel, and other upgrades including the \$150 million West Vancouver Freight Access rail project that will improve the flow of rail freight through the region by 40 percent.
- The Port is working with a coalition to address rail crossing safety.
- The Port objects to additional analysis that includes the transport route and consumption of the product and points out that no other commodity at the Port has undergone this type of analysis.
- A “cradle to consumption model” is excessive, complex, and difficult to quantify.
- Climate change related issues are national level concerns, outside the scope of the EIS, and the Port is committed to local approaches to addressing climate change through sustainability efforts. The Port complies with all applicable regulations, and analysis of climate change requires a broader approach and would require use of unproven analysis and singles out this type of project.

City of Vancouver

- The City is not taking a position for or against the project, but encourages EFSEC to make a full and comprehensive analysis of the probably significant adverse environmental impacts of the entire project and include analyses of cumulative effects and alternatives including the no-action alternative.
- The City lists several other regional projects that will impact the city including: Westway, Imperium, BHP Billiton, Millenium Bulk Terminals, and Gateway Pacific.
- The City requests that the following environmental elements be addressed and includes specific issues relevant to the City that should be analyzed: Earth, Air, Water, Plants, Animals, Energy and Natural resources, Environmental health, Land and Shoreline use, Housing, Aesthetics, Light and glare, Recreation, Transportation, Public services, and Utilities.
- The City states that \$45 million has been invested in transportation improvements to serve the Waterfront Development project and that the EIS needs to identify potential impacts and how they will be reduced to nonsignificant levels.
- Climate change and alternatives to delivery by rail to the Port of Vancouver should be addressed.
- Additional comments were attached from the Vancouver Fire department requesting a local and regional risk analysis, a Fire Operations Gap Analysis, and a proposed scope of work for a fire protection engineer to provide those analyses.

Attorney General of Washington, Counsel for the Environment

- Urges EFSEC to act to the “fullest extent possible” and engage in broad and thorough environmental review and include the full range of impacts in the area immediately surrounding the project site and statewide as well.
- Specifically, the following topics should be thoroughly evaluated:
 - Air quality effects surrounding the Project site
 - Impacts to Water quality and Aquatic life from emissions, potential oil spills, and/or train derailments at the Project location and along the rail route,
 - Potential effects to Wildlife from wildlife collisions, migratory patterns from additional rail traffic,
 - Cumulative impacts and Public Health and Safety.

Department of Archaeology & Historic Preservation

- The Department of Archaeology & Historic Preservation provided direction on how the project should be undertaken to identify archaeological and cultural resources as required by the EIS.

National Park Service

- The National Park Service (NPS) requests that all direct and indirect effects of the project be considered including railroad shipment from the Midwest, Port operations, marine vessel shipment, and climate change impacts associated with eventual fuel refining and combustion.
- NPS identifies the following areas managed or administered by the NPS that may be affected by the project:
 - Sections of the Lewis and Clark National Historic Trail (NHT), Oregon NHT and Ice Age Floods National Geologic Trail (NGT) along the Columbia River in Oregon and Washington: Visitor access and recreation
 - Fort Vancouver National Historic Site (NHS) in Vancouver, Washington: increased rail traffic through the Site, risk of derailment, cultural resources, visitor and employee safety, noise, air quality
 - Lewis and Clark National Historical Park (NHP) near Astoria, Oregon: effects of oil spills from marine vessels on land and marine animals, recreation, water quality
 - Glacier National Park (NP) in Montana: visitor and employee safety, wildlife movement and survival
- NPS requests that the project proponents be required to develop robust mitigation and emergency response plans or the entire length of the supply and distribution lines.

Spokane Fire District #3

- The Spokane Fire District #3 states that they have a good working relationship with the BNSF railroad and are committed to work with them to protect local citizens.

Washington Department of Ecology

- The scope of the EIS should evaluate: Air quality, Greenhouse gases, Floodplains management, Shorelands and Federal permits, and Spill prevention preparedness and response, specifically:
 - Spill risk from oil handling and transfer operations and increased vessel traffic calling on the facility
 - Adequacy of response equipment on the Columbia River
 - Columbia River channel depth limitations
 - Consider need for tug escorts
- Evaluate additional risk from rail transport associated with the facility water quality and industrial operations.

Washington Department of Fish and Wildlife

- Impacts to natural resources from the increase in rail transportation associated with the delivery of crude oil to the distribution terminal should be addressed.
- Increase in train traffic will likely increase the mortality of deer and elk from train strikes.
 - The impact associated with trains carrying crude oil to the project could be quantified through the continued count and collection of carcasses by railroad engineers. The additional rail traffic will also increase the amount of time the tracks are blocked to wildlife migration across the tracks. These and other impacts to wildlife associated with the increase in rail traffic should be address in the EIS, and mitigation provided.
- Work Window: The applicant suggests an October 1st to February 28th work window. WDFW proposes altering this window to October 15th to December 31st, primarily for fish, but there will be additional benefits for terrestrial wildlife and marine mammals, including:
 - Bald Eagle
 - Great Blue Heron
 - Stellar Sea Lions
 - Sandhill Crane
- Effects of impact hammers
 - The use of impact hammers will affect both aquatic and terrestrial species. Some combination of noise and vibrations will travel through water, ground and air. The noise and vibrations associated with the impact hammer have been evaluated for aquatic and above ground environments but the distance vibrations will travel through the ground has not.
- Special status species
 - There is potential for special status species to be present in these habitats during construction and they could be exposed to elevated terrestrial noise levels. WDFW recommends addressing species and habitats found on the State Priority Habitat and Species list.
- Habitat loss
 - Recognizing that the project site's highly-developed and de-vegetated nature limit the value of the habitat, WDFW still suggests the applicant consider compensatory mitigation for the permanent and temporary impacts to wildlife foraging caused by the removal of the upland cottonwood stands not already permitted for removal, as well as the riparian buffer.
- Recreational and commercial fisheries
 - Please address recreational and commercial fisheries impacts from additional shipping traffic during peak fish runs. Address the possibility of the nets and lines being caught on ships and becoming compromised. Also address any displacement of fish away from normal fishing grounds due to increase shipping.
- Monitoring and mitigation plans
 - WDFW feels a construction and post-construction monitoring plan for fish, wildlife, and habitat is essential.
- Oil spill impacts
 - WDFW suggests that the EIS should include a description of potential risks of a spill to fish and wildlife species.
- Other best management practices
 - WDFW suggests considering lighting BMPs.

Washington Department of Health

- Requests that the scope include potential health impacts for the entire length of the statewide rail corridor and shipping lanes in addition to those at the project site.
- Requests that a Health Impact Assessment be used.
- Air Quality
 - Diesel exhaust
 - Passenger vehicle emissions

- Greenhouse gas emissions
- Noise
- Railroad Traffic- access to emergency care
- Spills- Drinking water systems and supplies
 - EIS needs to address spills along rail lines and downstream
 - Need to map 100-year and 500-year flood zones and site facilities above these elevations
 - Needs a spill prevention and response plan
- Train derailment and potential public health impacts
- Railway traffic
 - Public health impacts
 - Recreation impacts
 - Community wellness

Washington Department of Natural Resources

- Washington Department of Natural Resources (WDNR) manages over 3 million acres of state trust lands and 2.6 million acres of state-owned aquatic lands.
- EFSEC should include a comprehensive analysis of alternative locations throughout the Columbia River corridor.
- Analyze impacts from increased vessel traffic, berthing patterns, and effects of the increased rail expansion.
- WDNR identified the following impact categories that need to be addressed in the immediate project vicinity
 - Waves and prop scour
 - Contaminated sediments
 - Geologic hazards
 - Flooding and volcanic events
 - Baseline studies for the area's biological resources
 - Shading
 - Construction
 - Operational noise
 - Artificial lighting
 - Aquatic vegetation
 - Marine biological resources
 - Air
 - Sediment and geomorphic processes
 - Hydrological dynamics
 - Point and nonpoint discharges
 - Spills
 - Cumulative impacts
 - Vessel fueling and pumpouts
 - Ballast water
 - Invasive species
 - Toxic chemicals
 - Sea level rise
 - Marine vessel transport
 - Historical and cultural preservation
- Impacts to state-managed lands in the lower Columbia region
 - Air
 - Water
 - Plants and animals
 - Environmental health
 - Natural resources
- Impacts to state-managed lands statewide
 - Geological hazards
 - Rail corridor expansion
 - Stream passage structures
 - Habitat conservation plan
 - Spill effects on water quality
 - Conservation lands
 - Environmental health
 - Land and shoreline use
 - Natural resources
 - Public services and utilities
 - Fire risk
 - Historical and cultural preservation
 - Rail capacity impact

Washington Department of Transportation

- State Highway System Impacts
 - Evaluate crossings and intersections with potential impacts
 - Identify mitigation strategies and alternative train routes that reduce impacts to the state highway system
 - EIS should analyze potential impacts from empty trains leaving the facility along the return route
 - The EIS should evaluate the effects on the highway system of using rail transportation compared to transportation via truck
- Local transportation impacts
 - EIS should confirm level of construction and operational traffic impact
 - An emergency plan should be developed in the event of a large on-site spill that could impact SR 501.

Washington Utilities and Transportation Commission

- Responsible for ensuring safety at the more than 2,600 public railroad crossings in Washington State.
- The EIS should evaluate the safety issues with increased train traffic to the Terminal. Increased train traffic would require upgrades to rail infrastructure.
- Accidents at public crossings have been increasing, particularly in Western Washington near population centers. Without proper planning, additional trains could result in more accidents.
- Additional trains could disrupt communities due to increased number of trains and blocked crossings due to two trains on the same track.
- Additional train traffic would increase wear and tear on crossings and affect workload for the agency.

Summary of comments from Tribal Nations and Representative Tribal Organizations:

Coeur D'Alene Tribe

- The Coeur D'Alene Tribe is opposed to the project
- The Tribe is a sovereign nation and has equal legal and constitutional status in their dealings with the U.S. federal government
- The Tribe requests the EIS assess negative impacts of shipping oil on public health and safety, the environment, and native ecosystems and wildlife.
- Potential impacts of spills along the entire route should be analyzed along with emergency response capability, public health impacts, and train traffic through communities along the route.
- Impacts to Tribal cultural resources, air, water, wildlife, fisheries from a train-related spill.

Columbia River Inter-Tribal Fish Commission

- Unquestionably, the highest risk and greatest danger posed by the Tesoro - Savage Project is the transport of crude oil through the Columbia River Gorge. The rail lines that could serve several oil and coal export projects run directly next to the Columbia River and will directly and disproportionately affect Tribal people along the river.
- Currently, rail traffic on both sides of the Columbia River is at high volume. During fishing season, Tribal fishers are faced with extremely dangerous conditions as they cross rail tracks, usually without the benefit of an overpass or lighted crossing signal, in order to reach their usual and accustomed fishing sites along the river bank.
- Where there is physical space that might allow for expansion, known issues associated with railway expansion along the Columbia include:
 - Construction and operating impacts on access to and use of Treaty Fishing Access Sites and In-lieu fishing sites

- Impacts to the Columbia River ecosystem
- Impacts to tribal cultural resources
- Impacts to scenic values
- Increase in train traffic, impeding economic activity and increasing risk to Tribal members using fishing sites
- Risk of derailments and spills that could impact fisheries
- Increase in ships and impacts to estuary habitats and stranding of aquatic species
- General site concerns
 - Dock expansion
 - Storage and handling of oil onsite
 - Polluted stormwater runoff
 - Dredging for construction and operations
 - Dredge spoils
 - Increase in large-sized ship traffic
- Analysis of estuarine ecosystem needs to include baseline bathymetry, hydrodynamic modeling study to determine effects on water flow, velocity, sediment transport, water quality, and temperature.
- Analysis needs to include effects from other regional oil and coal shipping proposals.

Confederated Tribes and Bands of the Yakama Nation

- The proposed unrefined oil facility, dock, and increased transportation activity associated with this project would create direct adverse impacts- far beyond any de minimis threshold- to Treaty rights, including, among other things, Treaty-reserved salmon, steelhead, lamprey, and other resources critically important to the Yakama Nation and its People.
- The Yakama Nation requests that the EFSEC deny Tesoro Savage Petroleum Terminal LLC's application
- To be clear, Yakama Nation will not negotiate nor agree to so-called mitigation for any violations or actions resulting in the diminishment or destruction of its Treaty-reserved rights and Treaty-protected resources. Put simply, there is no mitigation adequate to compensate my Tribe and its People for the continued degradation of our sacred places, the incremental but constantly worsening damages to our natural resources that sustain our culture, and the threats to the livelihoods and cultural practices of many Yakamas.
- Yakama Nation recommends that the scope of the (EIS) includes evaluations of all potential impacts to our cultural and Treaty-reserved resources, our environment, public health and safety, and to our economies.
- We also request that these cumulative impacts be studied on a region-wide level, from the unrefined oil's origins, through our homelands, to its final destination.
- The EIS should include:
 - Geology and soils at the proposed project site as well as along transport corridors.
 - Vegetation, including those of particular cultural significance to the Yakama Nation.
 - Fish and wildlife impacted by transport and potential spills.
 - Water quality impacts of spilled unrefined oil, including stormwater runoff and absorption at the storage site
 - Air quality effects in shipment and handling of unrefined oil.
 - Potential contributions of burned fuel to climate and climate change.
 - An analysis of the purpose and need for the energy and natural resources.
 - Environmental health impacts, including noise, risk of fire and explosion, and potential releases of toxic or hazardous materials in transit and on the proposed loading site.
 - Land and shoreline use and any required new development.
 - Potential impacts on local economies, population, housing, and employment.
 - Impacts to historic and cultural resources along the transportation corridor and onsite.
 - Aesthetics, including impacts to view sheds and access to recreational sites.
 - Effects on regional transportation, including vehicular, waterborne, and rail.
 - Disclosure of any needed infrastructure development, such as additional rail handling capacity or ancillary infrastructure.

- Potential impacts to the delivery of public services and utilities along the shipment route and in the vicinity of the terminal.
- A safety analysis of the potential impacts at current and projected levels of rail traffic to tribal fishers and their customers along the shipment route through the Columbia Gorge.
- An assessment of track capacity and traffic control measures necessary to handle the projected four additional unit trains that would deliver unrefined oil to the Tesoro Savage Terminal each day.
- An analysis of the likelihood and frequency of unrefined oil train derailments, shipping spills, and fire and explosion probabilities
- An analysis of the expected frequency and potential damage to structures and landscape features
- An analysis of the expected wild fires ignited by the projected four additional unit trains delivering unrefined oil to the Tesoro Savage terminal each day.
- An analysis of the emissions from rail and ship traffic, terminal operations.
- An analysis of impacts to all cultural resources, including Traditional Cultural Properties. Yakama Nation expects that the Area of Potential Effect (APE) for the Tesoro Savage project shall include the entire transportation route, including impacts from the unrefined oil's origins through our usual and accustomed areas.
- An analysis of all impacts to aquatic and terrestrial species and habitat along the transportation route, at the proposed site of the Tesoro Savage Terminal, and adjacent to the shipping channel westward of the terminal.

Confederated Tribes of the Umatilla Indian Reservation (CTUIR)

- The evaluation should include adequate information to make an informed assessment as to the potential impacts to tribal rights under the Treaty of 1855 (12 Stat. 945), traditional use areas and the near- and long-term health and sustainability of tribal First Foods.
- The project will potentially negatively impact these sites and the fish that migrate past them.
- Additional trains may also adversely affect the ability of tribal members to access tribal fishing sites due to the increased obstruction at crossings. The additional rail traffic, and cumulative rail traffic from various energy development projects, should be examined to determine the potential impacts and measures to avoid or mitigate for those impacts.
- The river, its water and its fish would be subject to significant risks from construction and operation of the facility and the entire range of activities associated with it. Construction and operation degrade the immediate environment (for example, from increased emissions) and could exacerbate broader climate change effects, which are already occurring and to which First Foods and tribal communities maybe particularly vulnerable.
- A broad examination of this and other regional fossil fuel transport proposals is appropriate and necessary. Tesoro-Savage should not be analyzed in isolation, but in conjunction with the other proposed projects.
- The EIS should evaluate issues related to the environment, economics, aesthetics, air quality, wetlands, historic and cultural properties, fish, wildlife, plants, water quality, flood hazards, floodplain values, land use, navigation, shoreline erosion and accretion, recreation, energy needs and production, public safety, food production, and property use and ownership, for both Indian and non-Indian communities.
- There must be analysis of the exact type, nature and characteristics, of the oil shipped in order to fully evaluate the potential risks and any the development of any potential limitations on those oils that may be shipped.
- EFSEC should address oil spill risks and impacts along the rail route, at the terminal, in the Columbia River, and in the Pacific Ocean; increased rail and ship traffic; impacts to streams, wetlands, fish and fishing areas; air quality and respiratory impacts; rail tank car safety; impacts of the terminal on local businesses (including tribal); types of oil shipped (including their health risks, spill clean-up plans and contingencies); climate change impacts; impacts on historic and cultural resources and properties; and effects on the Columbia River Gorge National Scenic Area.

- In addition, rail transit and operations associated with the project will affect traditional cultural properties, ancestral human remains, archaeological resources, historic properties of religious and cultural significance to the CTUIR; sites protected and governed by the National Historic Preservation Act, Archaeological Resources Protection Act, Native American Graves Protection and Repatriation Act and other laws. The transit corridor will pass through or otherwise affect tribal trust lands and traditional use areas. Information pertaining to changes in rail usage is needed to assess the effects the proposed undertaking will have on those properties. An evaluation of impacts from rail and transportation impacts to these cultural resources and historic properties must be conducted through the entire route of the oil from its source.
- Some specific, immediate questions and information that might help inform the assessments include:
 - How many trains, and of what length, will convey the oil to the facility per day, week, and month?
 - Is there a maximum or upper limit on the amount of oil and/or the number of trains and/or ships that will be used?
 - What route(s) will the trains take?
 - What type of auxiliary in-water services will be required (e.g., tugboats)?
 - Will any dredging, or increased/altered maintenance dredging, be required? If so, how often?
 - What are the capabilities of the U.S. Coast Guard in the event of an oil spill at the facility? In the estuary? Along the Columbia River upstream, in the event of an accident or spill or that reaches the River?
 - What are the characteristics of the oil that may be spilled that are different from other crude oil spills (i.e. diluted bitumen)?
- Pursuant to the Centennial Accord, we believe it would be beneficial to consult with you on a government-to-government basis regarding the project.

Region 10 Regional Tribal Operations Committee

- Requests comprehensive EIS be completed that analyzes impacts and alternatives of this project along with other proposed oil and coal terminals in Washington and Oregon.
- The EIS must analyze impacts on treaty fishing sites, cultural resources, diesel emissions, risk of derailment in traditional hunting and gathering sites, and navigation for tribal fishers and others on the river.
- Regional impacts include increased vessel traffic risks to waters in Alaska and other ports of call.
- Tribal economies, communities, and human health are foremost concerns.
- EFSEC should consider the full scope of the impacts to each individual tribe in the region.
 - Specific issues to be analyzed
 - Cultural and fishing sites
 - Increased train traffic
 - Noise
 - Public health
 - Risk of derailment

Upper Columbia United Tribes

- All potential impacts from the entirety of transportation to terminus should be considered for the Tesoro Savage crude-by-rail uploading and marine loading facility at the Port of Vancouver, Washington.
- Within a comprehensive EIS, the UCUT would like you to analyze, examine alternatives and propose mitigation for the projects' potential negative impacts on the following:
 - The potential impacts of large train-related oil spill(s) along the entire rail route from extraction site to port.
 - The transportation, emergency response capability, and public health impacts of additional train traffic through communities along the proposed oil by rail route.

- Impacts to area Tribal cultural resources, air, waters, wildlife and fisheries from a train-related oil spill.

The Confederated Tribes of the Warm Springs Reservation of Oregon

- The public safety and environmental impacts of the state's largest pipeline-on-wheels proposal deserve close scrutiny. For example, EFSEC must assess:
 - The potential impacts of a large train-related oil spill along the rail route.
 - The transportation and public health impacts of additional unit train traffic through communities along the proposed oil-by-rail route. This includes evaluating emergency response capabilities in Vancouver, where oil trains would deliver and store oil, and other communities along the rail and shipping route.
 - The increased risk of an oil tanker spill along the shipping route.
 - The project's impact on climate change.
 - Impacts to fisheries resources.
- The Confederated Tribes of the Warm Springs Reservation requests that the consideration of the impacts of this application, include, but not be limited to, impacts to the air and water quality, climate change, fisheries resources, public health and safety, cultural traditions, and ecosystems.

Summary of Comments from City Councils and Elected Officials:

Board of Clark County Commissioners (Steve Stuart, Tom Mielke, David Madore)

- The Board of Clark County Commissioners is neutral regarding the project and requests comprehensive analysis of potential impacts.
- The Commissioners identified the other regional projects that need to be included in a cumulative effects analysis
- The county asks that impacts on the following be considered: Parks, Recreation and scenic resources; Movement/circulation of people and goods; Existing land use plans; Traffic; and Police, Fire and Emergency services.
- The EIS must consider alternatives to the project, including a no-action alternative.
- They expressed concern over the proposed terminal's proximity to the Fruit Valley neighborhood and the Clark County Jail Work Center located 400 yards from the proposed project site.
 - Special consideration must be given to exposure to toxic chemicals, risk of fire, spills, explosions and noise.

Liz Pike, Washington State House of Representatives

- Representative Liz Pike's comments focused on her interest in supporting a strong local economy and the potential economic benefits that the project would bring to the region.
- She requests that the environmental analysis be 'purposefully focused' on potential impacts from the facility rather than on impacts beyond the site-based facility.

Spokane City Council (Ben Stuckart, Jon Snyder, Amber Waldref)

- The Spokane City Council identified the safety risks involved with shipping oil by rail including potential for spills, explosions, noise pollution, and delays for local traffic and emergency response.
- Greenhouse gas emissions would also increase from additional train traffic and traffic delays.

Percent of Issues By Category

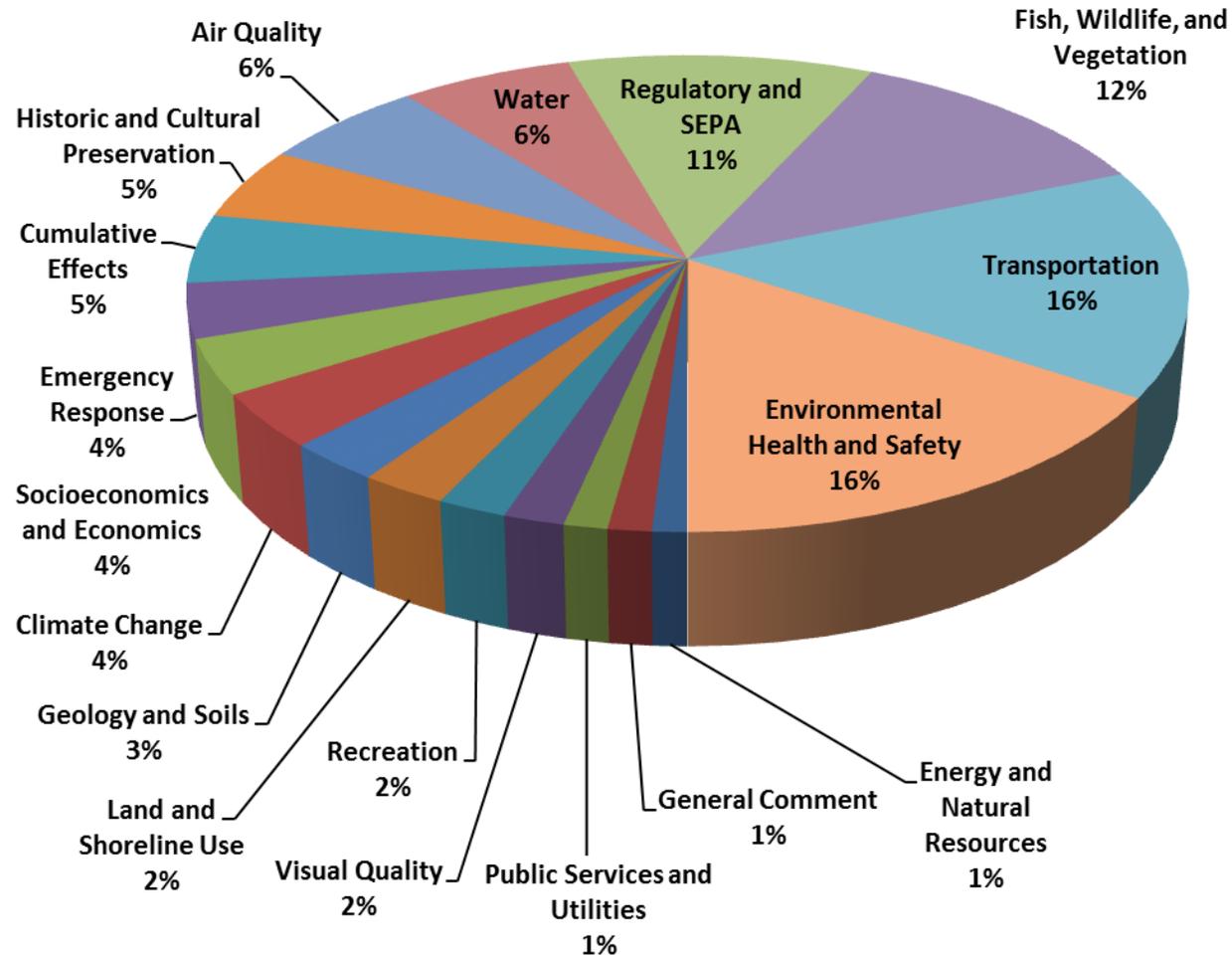


Figure 6: Percent of issues by category for written comments received from Agencies, Tribes, and Officials.

Issues by Category and Geographic Area of Concern

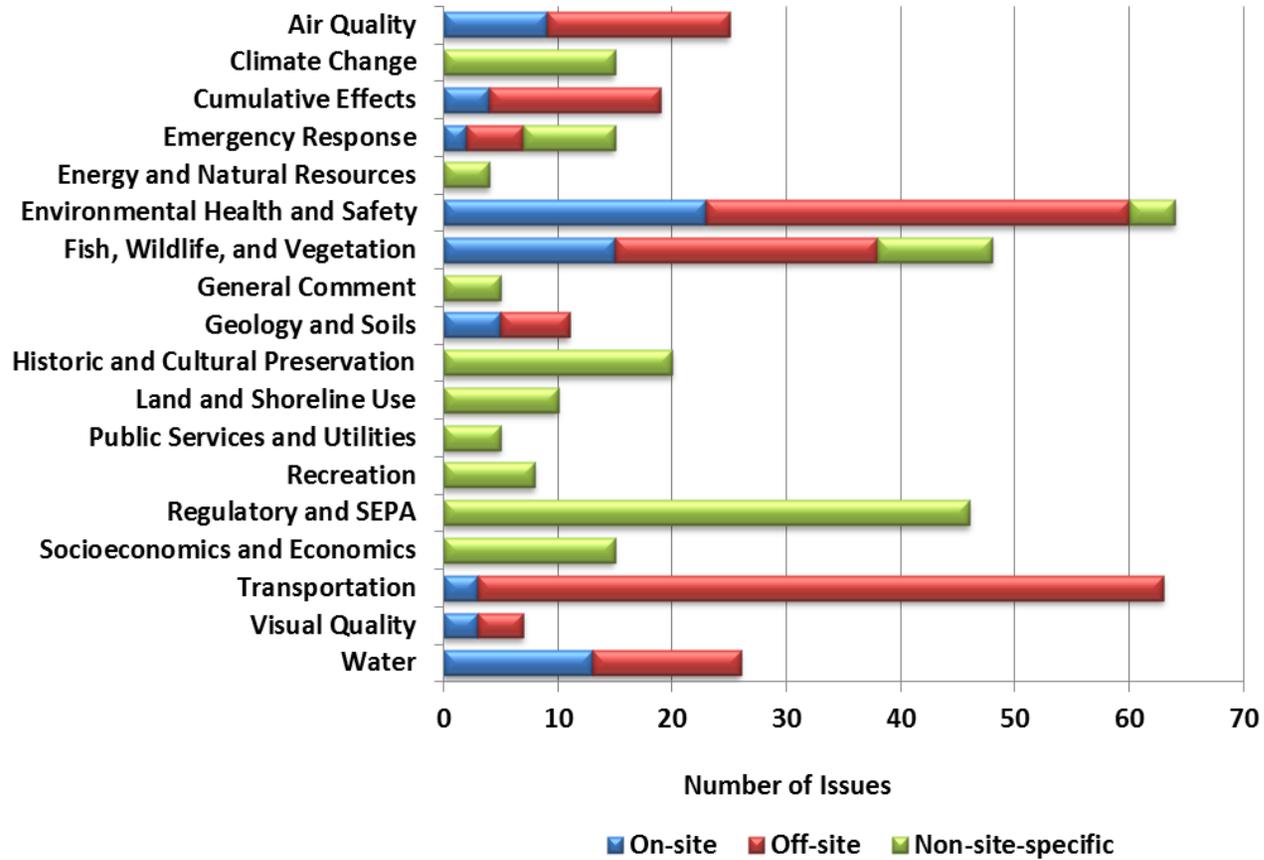


Figure 7: Number of issues by category for written comments received from Agencies, Tribes, and Officials.

Table 3: Summary of issues in comments from Agencies, Tribes, and Officials received during the scoping period

Issue	SEPA Topic	Number of Issues	Description
Air Quality	Air	25	<p>9 issues focused on air emissions, dust, and odors from facility operations; including possible health effects from release of air toxics.</p> <p>12 issues focused on exhaust emissions from diesel-electric locomotives.</p> <p>4 issues focused on exhaust emissions from marine vessels operating on the Columbia River or moored at the loading dock.</p>
Climate Change	Air	15	<p>15 issues requesting consideration and analysis of effects on global climate change.</p>
Cumulative Effects	Secondary and Cumulative Impacts	19	<p>4 issues requesting analysis of the cumulative impacts from other past, present, and reasonably foreseeable projects on the project site or in the project vicinity.</p> <p>15 issues requesting analysis of the cumulative impacts associated with other crude oil and coal terminal projects, including associated rail and marine operations.</p>
Energy and Natural Resources	Energy and Natural Resources	4	<p>4 issues focused on national energy policy, fossil fuels vs. renewable energy (wind, solar, biofuels), and energy conservation.</p>
Environmental Health and Safety	Environmental Health	64	<p>3 issues concerning the volatility of crude oil and the risk of fire and/or explosion at the project site (including security/terrorism concerns).</p> <p>14 issues concerning the volatility of crude oil and the risk of fire and/or explosion along rail or marine transportation routes (including security/terrorism concerns).</p> <p>7 issues focused on concerns about oil spills at the project site and the marine loading area.</p> <p>17 issues focused on concerns about oil spills along rail and marine vessel transportation routes.</p> <p>8 issues concerned about noise from plant operations.</p> <p>6 issues concerned about noise along rail and marine transportation routes.</p> <p>5 issues concerned with release of toxic or hazardous materials from disturbance or excavation of contaminated soils or sediments located on the project site.</p> <p>4 issues requesting the study of potential acute/chronic health effects from exposure to air toxics, particulates, and contaminated water due to normal</p>

Issue	SEPA Topic	Number of Issues	Description
			operations and/or accidental releases or spills.
Emergency Responses	Public Services and Utilities	15	<p>2 issues concerning the adequacy of existing emergency plans and the ability of the local police departments, fire departments, and emergency medical personnel to respond to derailments, collisions, other accidents that result in catastrophic oil spills, explosions, or fires at the project site or vessel loading area.</p> <p>3 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, and emergency medical personnel to respond to derailments, collisions, other accidents that result in catastrophic oil spills, explosions, or fires along offsite rail transportation routes.</p> <p>2 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, emergency medical personnel to respond to vessel collisions, groundings, or other accidents that result in catastrophic oil spills, explosions, or fires.</p> <p>8 issues concerning the ability of plant operators and the BNRR to implement emergency response plans and spill response plans in the event of train derailments or collisions, vessel loading mishaps, vessel collisions and groundings, or other accidents resulting in limited or catastrophic oil spills.</p>
Fish, Wildlife, and Vegetation	Plants and Animals	48	<p>10 issues concerning impacts on fish, wildlife, and vegetation.</p> <p>15 issues concerning potential onsite impacts on fish, wildlife, vegetation, wetlands, threatened and endangered species from construction and operation of the proposed project, including habitat removal, introduction of exotic plants and invasive marine organisms; disturbance, displacement, and direct mortality from construction activities; and oil spills in upland areas or in the marine vessel loading area.</p> <p>9 issues concerning potential offsite impacts on fish, wildlife, vegetation, and threatened and endangered species from off-site train operations, including disturbance or direct mortality due to collisions, disruption of migration routes, and impacts from a limited or catastrophic oil spill and/or fire.</p> <p>14 issues concerning potential offsite impacts on fish, wildlife, vegetation, and threatened and endangered species from off-site train operations, including disturbance or direct mortality due to collisions, disruption of migration routes, and impacts from a limited or catastrophic oil spill and/or fire.</p>
General Comment	General Comments	5	<p>3 comments stating opposition to the proposed project.</p> <p>2 comments stating support for the proposed project.</p>
Geology and Soils	Earth	11	5 issues concerning onsite geology, soils, erosion, earthquakes, liquefaction,

Issue	SEPA Topic	Number of Issues	Description
			including the shoreline area. 6 issues concerned with geologic conditions along rail or marine transportation routes.
Historic and Cultural Preservation	Historic and Cultural Preservation	20	20 issues concerning impacts to archaeological resources, historic buildings, or tribal concerns.
Land and Shoreline Use	Land and Shoreline Use	10	8 issues regarding the consistency/inconsistency of the proposed project with adopted land use plans and zoning. 2 issues concerning the compatibility of the proposed project with nearby residential land uses and the proposed Columbia Waterfront Development Project.
Public Services and Utilities	Public Services and Utilities	5	5 issues concerning the increased demands on public services (police, fire, emergency medical services) and public utilities (water, sewer, electricity) during normal plant operations.
Recreation	Land and Shoreline Use	8	8 issues concerning potential negative effects on local and regional recreational resources (i.e. parks, trails, and the Columbia River Gorge National Scenic Area).
Regulatory and SEPA		46	7 issues requesting consideration of reasonable alternatives to the proposed project, including consideration of alternative sites, alternative transportation routes, and alternative sources of energy 1 issue regarding the purpose and need for the project. 38 issues pertaining to federal, state, or local regulations, SEPA procedures or requirements, the Port of Vancouver lease agreement with Tesoro-Savage, or other legal concerns
Socioeconomics & Economics	Population, Housing, Social Elements, Economics	15	2 issues concerning the positive impacts on jobs, economic growth, and local and state tax revenue. 13 issues concerning the negative impacts on property values, quality of life, attraction of new residents and businesses, and tourism.
Transportation	Transportation	63	3 issues on potential impacts from plant construction and operation on local vehicular traffic and safety. 22 issues focused on concerns over increased numbers of oil tankers operating on the Columbia River, including the increased risk of ship collisions and groundings. 38 issues focused on concerns over increased train traffic in the Vancouver metropolitan area and along major rail corridors in Washington State,

Issue	SEPA Topic	Number of Issues	Description
			including increased traffic delays and delays to emergency vehicles at railroad crossings, interference with the movement/circulation of people and goods, and increased risk of derailments and accidents.
Visual Quality	Land and Shoreline Use	7	3 issues concerning the visual or aesthetic impacts of the new facility on existing views or vistas 4 issues concerning the visual or aesthetic impacts of additional trains operating in the Columbia River Gorge National Scenic Area.
Water	Water	26	13 issues concerning potential impacts on rivers, streams, ground water, and aquifers near the project site from limited or catastrophic oil spills. 5 issues concerning potential impacts on the Columbia River and adjacent riparian waterways from limited or catastrophic oil spills. 8 issues concerning potential impacts on rivers, streams, and aquifers located along major rail routes from limited or catastrophic oil spills.

4 Public Comments Received During the Scoping Period

In addition to the opportunity to provide verbal comments at the scoping meetings, the public was invited to submit written comments on the scope of the EIS to EFSEC. Comments were submitted by mail and e-mail through the EFSEC website. A total of 30,947 individual letters and e-mails were received and assigned one or more issue codes to allow analysis of key issues (See Appendix D for the list of codes).

Form Letters

Of the written comments, 30,212 followed one of 10 form letter templates. Two of the form letter submittals were in the form of petitions, where multiple names were submitted under one comment letter (636 names were added for form letter 3, and 554 names were added for form letter 10). Some of the petitioners also included discrete comments, but they were not coded individually. Issues identified in the individual form letters were assigned issue codes and are summarized in Tables 4 and 5 and Figures 8 and 9. Figure 10 shows the number of issues identified in all of the form letters collectively. From letter 3 with over 24,000 letters, and form letter 2 with over 5,000 letters represent the greatest proportion of issues represented. An example of each of the ten form letters is included in Appendix E. If an individual form letter had additional substantive issues, the issues were categorized and included in Table 5 and Figures 11 and 12 as discrete issues (exempting petitions).

Discrete Issues

The remaining discrete issues from the written comments, grouped by issue category, are summarized in Table 5 and in Figures 11 and 12. A summary table showing each issue and the issue codes assigned is included in Appendix F. Most discrete comments were in the general comments category (80 percent opposed and 7 percent supporting, with the remainder non-specific) and the environmental health and safety category (40 percent were concerned with spills, 32 percent were concerned about explosions or the volatility of the oil, and 20 percent with potential health effects from operations). The next largest category, transportation, was dominated by concerns about increased rail traffic as a result of the proposed project. Energy and natural resources and climate change were significant concerns, with the majority of energy related comments recommending alternatives to fossil fuels. Socioeconomic issues were dominated by concerns about negative impacts (86 percent) versus positive impacts (14 percent).

Table 4: Number of issues in each category for each form letter.

Category	Form Letter Number										Total
	1	2	3	4	5	6	7	8	9	10	
Air Quality				1		1		1			3
Climate Change		1	1		1	1	1		1		6
Cumulative Effects	1		1		2	1			1		6
Emergency Response		3	1	1	2	3		1			11
Energy & Natural Resources				1			1	1			3
Environmental Health and Safety		3	1	1	1	1	2	1	2		12
General Comment	1	1	1	1	1	2	1	1	1		10
Geology and Soils								1			1
Public Services and Utilities				1				1			2
Regulatory and SEPA	2			2				2		1	7
Socioeconomics and Economics			1	1		3	2	1			8
Transportation			2		3	2	1		1		9
Visual Quality	1										1
Water						1	1	1			3
Issues in each Form Letter	5	8	8	9	10	15	9	11	6	1	82
Form Letters Received	480	5,349	24,338	293	175	17	130	59	5	554	31,400

Note:

1. Total of 82 discrete issues in the 10 form letters.
2. The total number of form letters received in this table is higher than the number of form letters indicated in the preceding paragraph (30,212) because it includes the additional 1,190 form letter comments received in the form of petitions.

Percent of Issues By Category- Form Letters

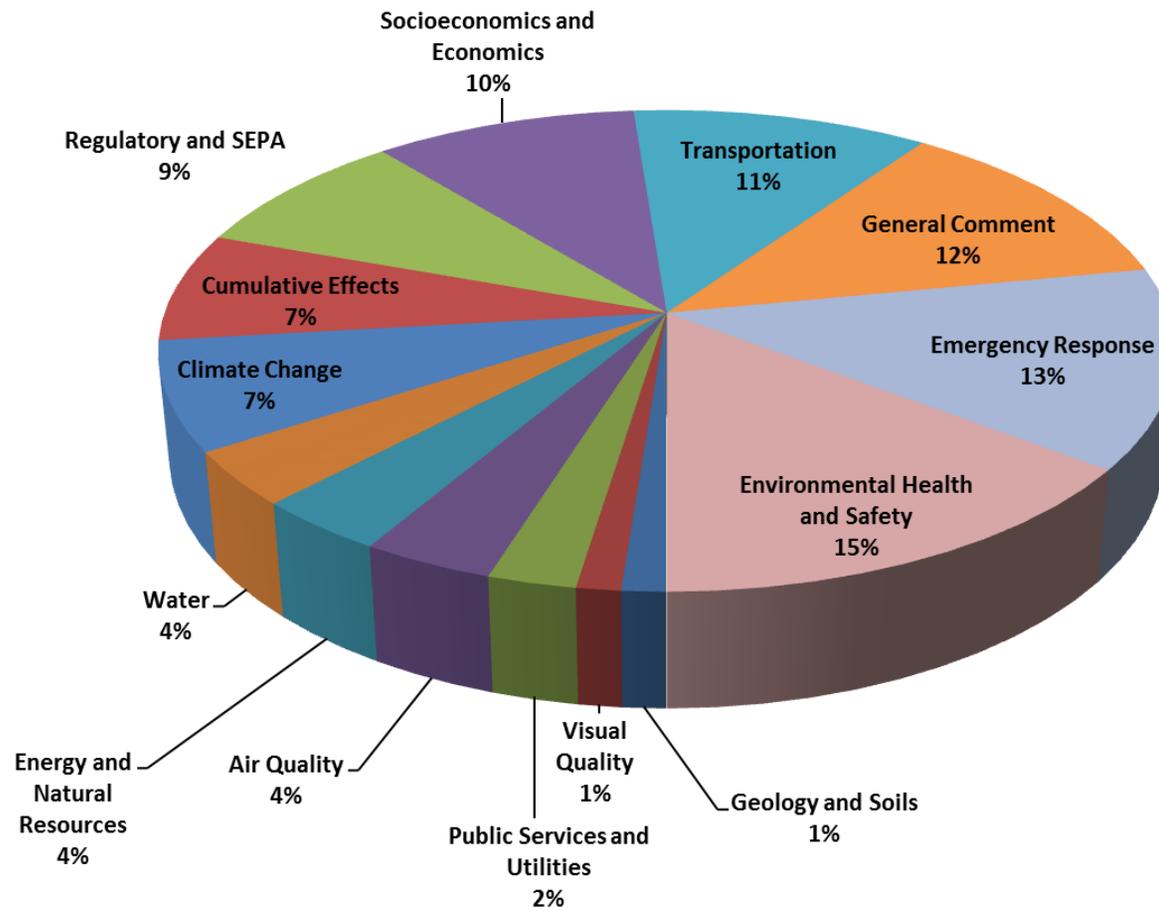


Figure 8: Percent of issues identified by category for form letters.

Form Letter Issues by Category and Geographic Area of Concern

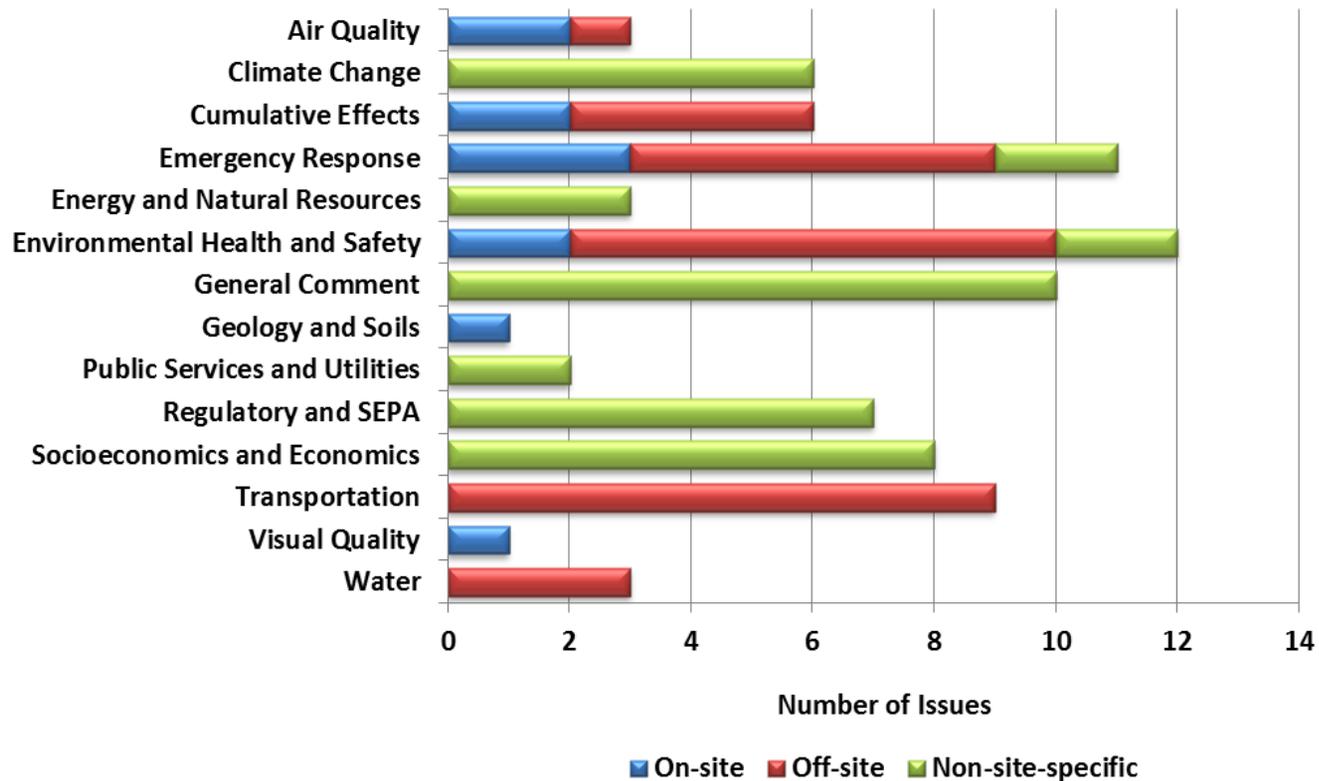


Figure 9: Number of issues by category for the ten form letters.

Number of Issues in Each Category for All Form Letters

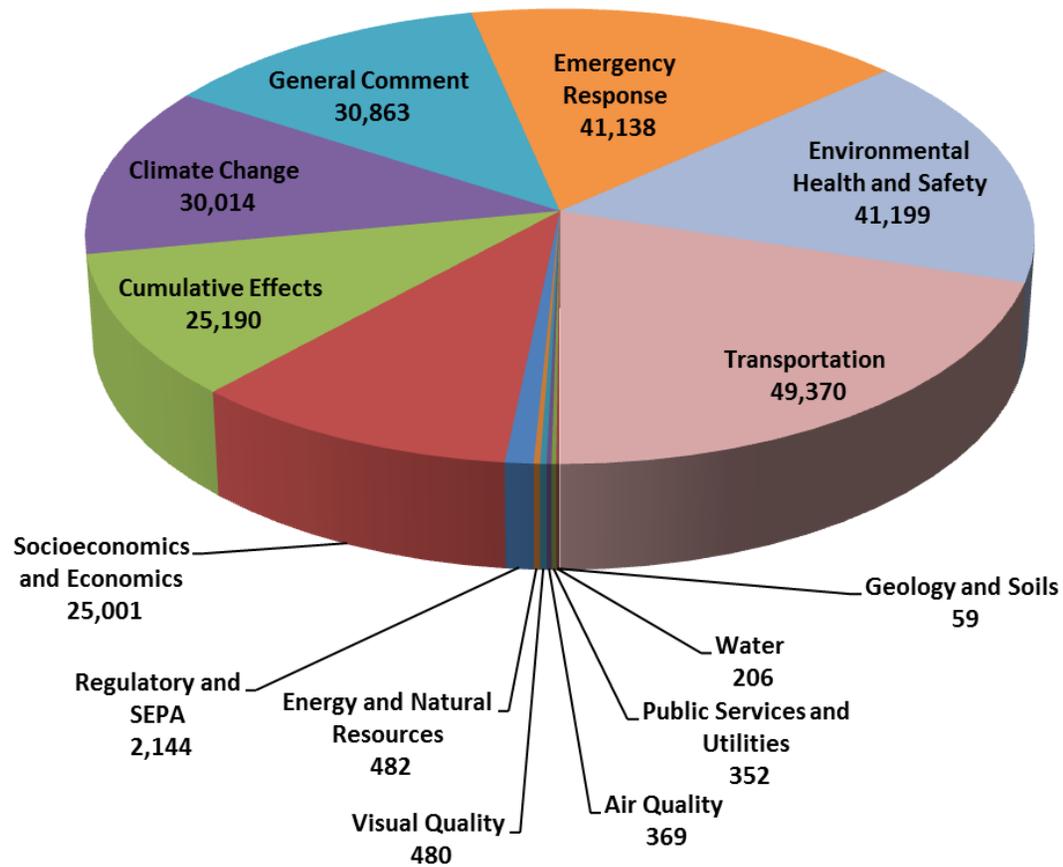


Figure 10: Number of issues by category for all form letters.

Percent of Discrete Issues By Category

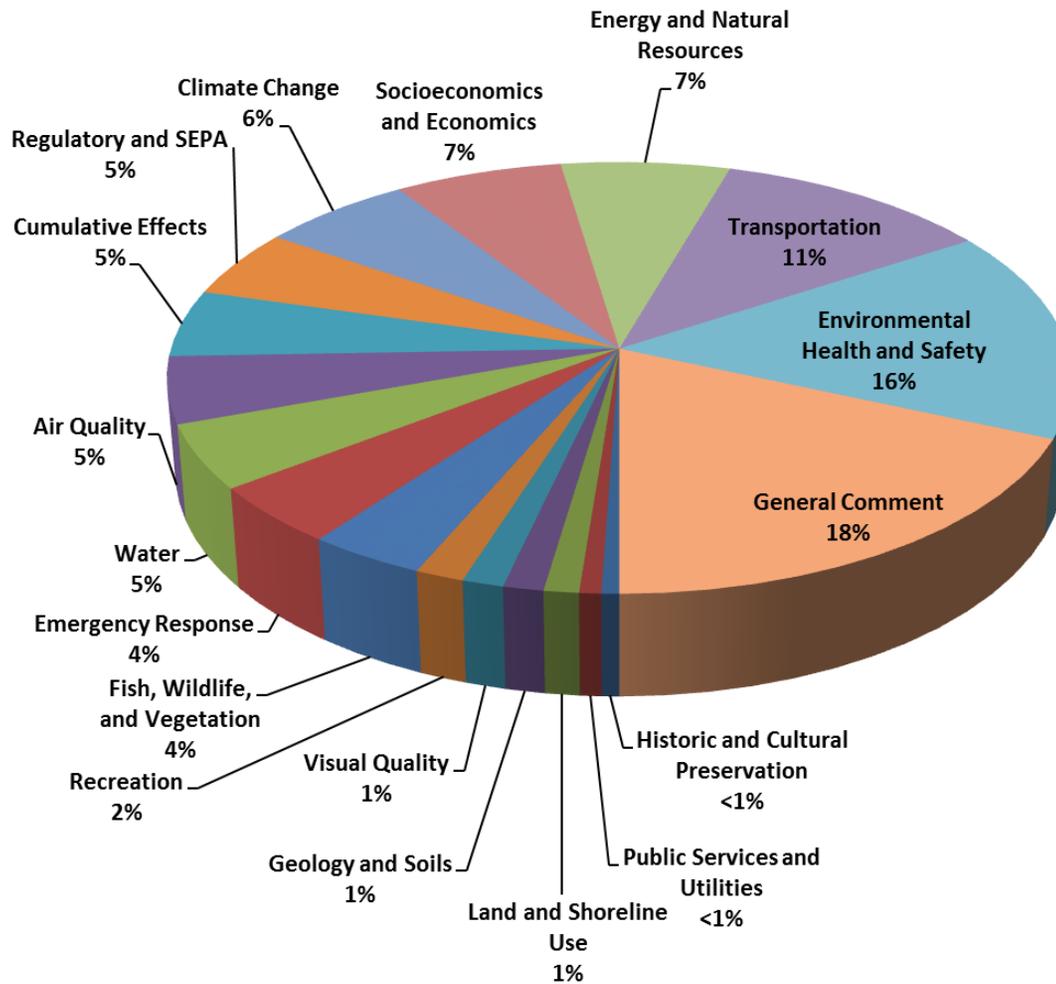


Figure 11: Percent of discrete issues by category from written comments (not including form letters)

Discrete Issues by Category and Geographic Area of Concern

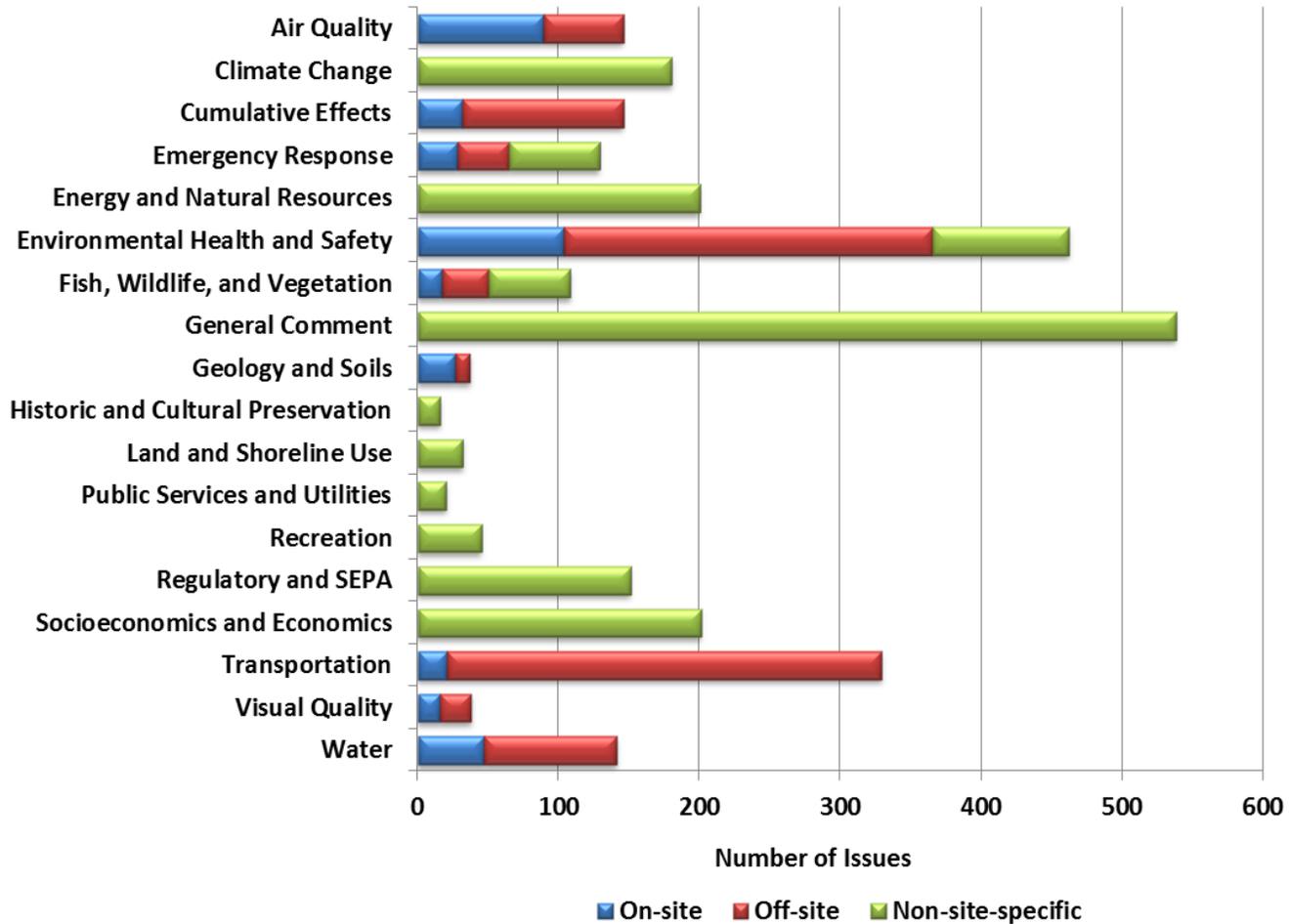


Figure 12: Number of discrete issues by category from written comments (not including form letters)

Table 5: Summary of issues in written comments

Issue	SEPA Topic	Number of Form Letter Issues	Description of Form Letter Issues	Number of Discrete Issues	Description of Discrete Issues
Air Quality	Air	369	<p>352 issues focused on air emissions, dust, and odors from facility operations; including possible health effects from release of air toxics.</p> <p>17 issues focused on exhaust emissions from marine vessels operating on the Columbia River or moored at the loading dock.</p>	146	<p>89 issues focused on air emissions, dust, and odors from facility operations; including possible health effects from release of air toxics.</p> <p>45 issues focused on exhaust emissions from diesel-electric locomotives.</p> <p>12 issues focused on exhaust emissions from marine vessels operating on the Columbia River or moored at the loading dock.</p>
Climate Change	Air	30,014	30,014 issues requesting consideration and analysis of effects on global climate change.	180	180 issues requesting consideration and analysis of effects on global climate change.
Cumulative Effects	Secondary and Cumulative Impacts	25,190	<p>350 issues requesting analysis of the cumulative impacts from other past, present, and reasonably foreseeable projects on the project site or in the project vicinity.</p> <p>24,840 issues requesting analysis of the cumulative impacts associated with other crude oil and coal terminal projects, including associated rail and marine operations.</p>	146	<p>32 issues requesting analysis of the cumulative impacts from other past, present, and reasonably foreseeable projects on the project site or in the project vicinity.</p> <p>114 issues requesting analysis of the cumulative impacts associated with other crude oil and coal terminal projects, including associated rail and marine operations.</p>
Energy and Natural Resources	Energy and Natural Resources	482	482 issues focused on national energy policy, fossil fuels vs. renewable energy (wind, solar, biofuels), and energy conservation.	200	200 issues focused on national energy policy, fossil fuels vs. renewable energy (wind, solar, biofuels), and energy conservation.

Issue	SEPA Topic	Number of Form Letter Issues	Description of Form Letter Issues	Number of Discrete Issues	Description of Discrete Issues
Environmental Health and Safety	Environmental Health	41,199	<p>5,496 issues concerning the volatility of crude oil and the risk of fire and/or explosion along rail or marine transportation routes (including security/terrorism concerns).</p> <p>352 issues focused on concerns about oil spills at the project site and the marine loading area.</p> <p>29,997 issues focused on concerns about oil spills along rail and marine vessel transportation routes.</p> <p>5,354 issues requesting the study of potential acute/chronic health effects from exposure to air toxics, particulates, and contaminated water due to normal operations and/or accidental releases or spills.</p>	462	<p>46 issues concerning the volatility of crude oil and the risk of fire and/or explosion at the project site (including security/terrorism concerns).</p> <p>102 issues concerning the volatility of crude oil and the risk of fire and/or explosion along rail or marine transportation routes (including security/terrorism concerns).</p> <p>46 issues focused on concerns about oil spills at the project site and the marine loading area.</p> <p>135 issues focused on concerns about oil spills along rail and marine vessel transportation routes.</p> <p>9 issues concerned about noise from plant operations.</p> <p>24 issues concerned about noise along rail and marine transportation routes.</p> <p>3 issues concerned with the release of toxic or hazardous materials from disturbance or excavation of contaminated soils or sediments located on the project site.</p> <p>97 issues requesting the study of potential acute/chronic health effects from exposure to air toxics, particulates, and contaminated water due to normal operations and/or accidental releases or spills.</p>

Issue	SEPA Topic	Number of Form Letter Issues	Description of Form Letter Issues	Number of Discrete Issues	Description of Discrete Issues
Emergency Responses	Public Services and Utilities	41,138	<p>5,583 issues concerning the adequacy of existing emergency plans and the ability of the local police departments, fire departments, and emergency medical personnel to respond to major accidents that result in catastrophic oil spills, explosions, or fires at the project site or vessel loading area.</p> <p>29,879 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, and emergency medical personnel to respond to derailments, collisions, other accidents that result in catastrophic oil spills, explosions, or fires along offsite rail transportation routes.</p> <p>5,336 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, emergency medical personnel to respond to vessel collisions, groundings, or other accidents that result in catastrophic oil spills, explosions, or fires.</p> <p>310 issues concerning the ability of plant operators and the BNRR to implement emergency response plans and spill response plans in the event of train derailments or collisions, vessel loading mishaps, vessel collisions and groundings, or other accidents resulting in limited or catastrophic oil spills.</p>	129	<p>28 issues concerning the adequacy of existing emergency plans and the ability of the local police departments, fire departments, and emergency medical personnel to respond to major accidents that result in catastrophic oil spills, explosions, or fires at the project site or vessel loading area.</p> <p>30 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, and emergency medical personnel to respond to derailments, collisions, other accidents that result in catastrophic oil spills, explosions, or fires along offsite rail transportation routes.</p> <p>7 issues concerning the adequacy of existing emergency plans and the ability of local police departments, fire departments, emergency medical personnel to respond to vessel collisions, groundings, or other accidents that result in catastrophic oil spills, explosions, or fires.</p> <p>64 issues concerning the ability of plant operators and the BNRR to implement emergency response plans and spill response plans in the event of train derailments or collisions, vessel loading mishaps, vessel collisions and groundings, or other accidents resulting in limited or catastrophic oil spills.</p>

Issue	SEPA Topic	Number of Form Letter Issues	Description of Form Letter Issues	Number of Discrete Issues	Description of Discrete Issues
Fish, Wildlife, and Vegetation	Plants and Animals	0	None	108	<p>58 general issues concerning impacts on fish, wildlife, and vegetation.</p> <p>17 issues concerning potential onsite impacts on fish, wildlife, vegetation, wetlands, threatened and endangered species from construction and operation of the proposed project, including habitat removal, introduction of exotic plants and invasive marine organisms; disturbance, displacement, and direct mortality from construction activities; and oil spills in upland areas or in the marine vessel loading area.</p> <p>11 issues concerning potential offsite impacts on fish, wildlife, vegetation, wetlands, or threatened and endangered species from increased marine vessel operations on the lower Columbia River, including the introduction of invasive marine organisms; disturbance, displacement, or direct mortality due to collisions, propeller strike, or wake stranding, and impacts from a limited or catastrophic oil spill involving a tanker.</p> <p>22 issues concerning potential offsite impacts on fish, wildlife, vegetation, and threatened and endangered species from off-site train operations, including disturbance or direct mortality due to collisions, disruption of migration routes, and impacts from a limited or catastrophic oil spill and/or fire.</p>
General Comment	General Comments	30,863	<p>30,494 comments stating opposition to the proposed project.</p> <p>352 comments stating support for the proposed project.</p> <p>17 general, non-specific comments.</p>	538	<p>428 comments stating opposition to the proposed project.</p> <p>36 comments stating support for the proposed project.</p> <p>74 general, non-specific comments.</p>

Issue	SEPA Topic	Number of Form Letter Issues	Description of Form Letter Issues	Number of Discrete Issues	Description of Discrete Issues
Geology and Soils	Earth	59	59 issues concerning onsite geology, soils, erosion, earthquakes, liquefaction, including the shoreline area.	37	27 issues concerning onsite geology, soils, erosion, earthquakes, liquefaction, including the shoreline area. 10 issue concerned with geologic conditions along rail or marine transportation routes.
Historic and Cultural Preservation	Historic and Cultural Preservation	0	None	16	16 issues concerned over impacts to archaeological resources, historic buildings, or tribal concerns.
Land and Shoreline Use	Land and Shoreline Use	0	None	32	4 issues regarding the consistency/inconsistency of the proposed project with adopted land use plans and zoning. 28 issues concerning the compatibility of the proposed project with nearby residential land uses and the None proposed Columbia Waterfront Development Project.
Public Services and Utilities	Public Services and Utilities	352	352 issues concerning the increased demands on public services (police, fire, emergency medical services) and public utilities (water, sewer, electricity) during normal plant operations.	20	20 issues concerning the increased demands on public services (police, fire, emergency medical services) and public utilities (water, sewer, electricity) during normal plant operations.
Recreation	Land and Shoreline Use	0	None	45	45 issues concerning potential negative effects on local and regional recreational resources (i.e. parks, trails, and the Columbia River Gorge National Scenic Area).

Issue	SEPA Topic	Number of Form Letter Issues	Description of Form Letter Issues	Number of Discrete Issues	Description of Discrete Issues
Regulatory and SEPA		2,144	<p>480 issues requesting consideration of reasonable alternatives to the proposed project, including consideration of alternative sites, alternative transportation routes, and alternative sources of energy</p> <p>480 issues regarding the purpose and need for the project.</p> <p>1,184 issues pertaining to federal, state, or local regulations, State Environmental Policy Act (SEPA) procedures or requirements, the Port of Vancouver lease agreement with Tesoro-Savage, or other legal concerns.</p>	151	<p>45 issues requesting consideration of reasonable alternatives to the proposed project, including consideration of alternative sites, alternative transportation routes, and alternative sources of energy</p> <p>12 issues regarding the purpose and need for the project.</p> <p>94 issues pertaining to federal, state, or local regulations, State Environmental Policy Act (SEPA) procedures or requirements, the Port of Vancouver lease agreement with Tesoro-Savage, or other legal concerns.</p>
Socioeconomics & Economics	Population, Housing, Social Elements, Economics	25,001	<p>352 issues concerning the positive impacts on jobs, economic growth, and local and state tax revenue.</p> <p>24,649 issues concerning the negative impacts on property values, quality of life, attraction of new residents and businesses, and tourism.</p>	201	<p>30 issues concerning the positive impacts on jobs, economic growth, and local and state tax revenue.</p> <p>171 issues concerning the negative impacts on property values, quality of life, attraction of new residents and businesses, and tourism.</p>

Issue	SEPA Topic	Number of Form Letter Issues	Description of Form Letter Issues	Number of Discrete Issues	Description of Discrete Issues
Transportation	Transportation	49,379	<p>24,530 issues focused on concerns over increased numbers of oil tankers operating on the Columbia River, including the increased risk of ship collisions and groundings.</p> <p>24,840 issues focused on concerns over increased train traffic in the Vancouver metropolitan area and along major rail corridors in Washington State, including increased traffic delays and delays to emergency vehicles at railroad crossings, interference with the movement/circulation of people and goods, and increased risk of derailments and accidents.</p>	329	<p>21 issues on potential impacts from plant construction and operation on local vehicular traffic and safety.</p> <p>52 issues focused on concerns over increased numbers of oil tankers operating on the Columbia River, including the increased risk of ship collisions and groundings.</p> <p>256 issues focused on concerns over increased train traffic in the Vancouver metropolitan area and along major rail corridors in Washington State, including increased traffic delays and delays to emergency vehicles at railroad crossings, interference with the movement/circulation of people and goods, and increased risk of derailments and accidents.</p>
Visual Quality	Land and Shoreline Use	480	480 issues concerning the visual or aesthetic impacts of the new facility on existing views or vistas.	38	<p>16 issues concerning the visual or aesthetic impacts of the new facility on existing views or vistas.</p> <p>22 issues concerning the visual or aesthetic impacts of additional trains operating in the Columbia River Gorge National Scenic Area.</p>
Water	Water	206	<p>59 issues concerning potential impacts on the Columbia River and adjacent riparian waterways from limited or catastrophic oil spills.</p> <p>147 issues concerning potential impacts on rivers, streams, and aquifers located along major rail routes from limited or catastrophic oil spills.</p>	141	<p>47 issues concerning potential impacts on rivers, streams, ground water, and aquifers near the project site from limited or catastrophic oil spills.</p> <p>50 issues concerning potential impacts on the Columbia River and adjacent riparian waterways from limited or catastrophic oil spills.</p> <p>44 issues concerning potential impacts on rivers, streams, and aquifers located along major rail routes from limited or catastrophic oil spills.</p>