LUP-54033

CITY OF Vancouver WASHINGTON

SUBMIT TO:
City of Vancouver
Community & Economic Development
415 W. 6th ST
Vancouver, WA 98660
www.cityofvancouver.us

SEPA ENVIRONMENTAL CHECKLIST WAC 197-11-960

Property Owner: Port of Vancouver, USA (Print or Type Name) Telephone: (360) 693-3611

Mailing Address: 3103 NW Lower River Road, Vancouver WA 98660 (No., City, State, ZIP)

Applicant: NuStar Terminals Services, Inc. (Print or Type Name) Telephone: (360)-694-8591

Mailing Address: 2565 NW Harborside Drive and 5420 NW Fruit Valley Road, Vancouver WA 98660 (No., City, State, ZIP)

Relationship to Owner: Lessee

Tax Assessor Serial Number(s): 152190-000, 502010-000, 502010-002, 151979-000, 59115010, 502015-000, 502020-001, 502020-000, 502020-003, 502010-001

Legal description: Lot(s) _____ Block(s) _____ Plat name _____
(If a Metes and Bounds description, check here ☐, and attach narrative to this application.)

Site Address (if any): 2565 NW Harborside Drive Vancouver WA 98660

② Include 8½" x 11" copies of ☒Quarter Section Map, ☒Topographic Map, ☐ Scaled Site Plan. Delineate site on maps.
Notice to Applicants: You must use the current revision of this form or your application will not be accepted. If you use our disk version of this form (MS Word 6.0) you may not alter the format. Make sure you have the current version before submittal.

Purpose of checklist:
Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants: [help]
This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.
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.

Instructions for Lead Agencies:
Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals: [help]
For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. BACKGROUND [help]

1. Name of proposed project, if applicable: [help]
Vancouver Biofuel Conversion Project

2. Name of applicant: [help]
NuStar Terminals Services, Inc.

3. Address and phone number of applicant and contact person: [help]
Aaron Flett
Project Manager
NuStar Energy LP
2565 NW Harborside Dr
Vancouver, WA 98660
T: (360) 694-8591 F:(360) 694-9244

4. Date checklist prepared: [help]
May 27, 2016

5. Agency requesting checklist: [help]
City of Vancouver

6. Proposed timing or schedule (including phasing, if applicable): [help]
It is anticipated that construction would start as soon as City approval is obtained in 2016 and would be completed in 2017.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [help]
As part of NuStar operations and response to market conditions, NuStar may request additional retrofits to accommodate customers. Should the needs of its customers result in additional retrofitting, further review under SEPA may be required if this results in environmental impacts that exceed those addressed in this checklist.

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

    1. *A Pre-Application Conference was held for the project on January 21, 2016. Comments were received from the City of Vancouver in the pre-application conference meeting notes (Appendix A).*

    2. *Harris Group, Inc. prepared a Preliminary Hydrology Report for the Vancouver Transportation Logistics Improvement Project in October 24, 2014. This report is currently being updated to reflect changes in the square feet of impervious surfaces being replaced*

and will be submitted to the city as part of the land use application.

3. *A Critical Areas Report has been prepared for the project to address geologic hazard areas at the project site. Geotechnical reports referenced in the Critical Areas Report are incorporated by reference. As indicated in the pre-application conference meeting notes (Appendix A), the following existing geotechnical reports remain valid, and an updated geotechnical report is not required for the proposed project:*
   - *Ash Creek Associates. 2013. Draft 2013 Remedial Investigation Report. NuStar Terminals Services, Inc. Vancouver Terminal, Vancouver, Washington.*
   - *Professional Service Industries, Inc. (PSI). 2012. Geotechnical Investigation for the Proposed New Caustic Storage Tank, Port of Vancouver, Vancouver, Washington, PSI Project No. 0704556-3. August 7, 2012.*
   - *PSI. 2013. Geotechnical Consultation for NuStar Proposed Crude by Rail Improvements, Terminal 2 Port of Vancouver, Vancouver, Washington, PSI Project No. 0704512-2. August 2013.*

   An amended Air Discharge Permit from Southwest Clean Air Agency (SWCAA) is being applied for concurrently with land use approval and will be obtained prior to construction.

4. *An updated Fire Operations Impact Study and Gap Analysis Study are being prepared for the project and will be submitted to the Vancouver Fire Department (VFD) for review and approval. The VFD has agreed that the study can be completed concurrently with the land use application process. Prior to engineering approval, the VFD will approve the study, and NuStar and the VFD will formulate an agreement relating to Firefighting equipment and/or training necessary. Due to the change in commodity, NuStar is required to obtain a new International Fire Code (IFC) Operational Permit and a Hazardous Material Regulatory Fee Certificate from the VFD.*

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. [help]
   - *Yes. Two applications are currently being processed at NuStar's Dry Bulk Facility to address operational improvements: (1) City of Vancouver Type 2 Site Plan Review,*

Shoreline Substantial Development, and Critical Areas Permit application (for improvement at existing buildings in the shoreline) was submitted on March 3rd, 2016. A fully complete determination was issued on April 6th, 2016, and a preliminary decision is expected on or before July 6th, 2016; and (2) a draft application for a Groundwater Discharge Permit was submitted to the Washington Department of Ecology in early 2016 to address stormwater at the Annex Terminal. The permit application is currently awaiting review.

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

It is expected that the proposed project will require the following permits and approvals from the City of Vancouver:

- *Site Plan Review*
- *Critical Area Permit (geologic hazard areas)*
- *Grading Permit*
- *Building Permit*
- *Archaeological Predetermination-Exemption*
- *SEPA Review*
- *Modified Publically Owned Treatment Works (POTW) permit for rail rack stormwater discharge*
- *Approval of the Fire Operations Impact Study and Gap Analysis Study by the VFD*
- *IFC Operational Permit and a hazardous material regulatory fee certificate from the VFD*

In addition, an amended Air Discharge Permit will be obtained from SWCAA prior to construction. This SEPA checklist will be used to support the amended Air Discharge Permit as well. Once submitted, status updates for the application can be found on SWCAA's website.

To support the project's application requirements for the permits and approvals listed above, the following studies will be updated:

- *Facility Response Plan (NuStar)*
- *Spill Prevention, Control, and Countermeasures (SPCC) Plan (NuStar)*
- *Fire Operations Impact Assessment and Gap Analysis Study (NuStar and VFD)*

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.) [help]

The project proposes retrofitting existing facilities to receive ethanol via rail or marine vessel, store it temporarily, and transfer it to tanker trucks and marine vessels for shipment via regional highway systems or the Columbia River. The project includes modifications to the existing Port rail tracks at the Port of Vancouver (Port), Main terminal (located in Terminal 2), including the addition of a new access platform, piping, pumps, and utility relocations in the Main Terminal rail area. Additional pump, piping, and electrical modifications will be made in the Main Terminal tank T-12001 tank farm. New piping will also be installed to the existing inter-terminal piping system to manage product movements between the Main Terminal and Annex Terminal, consistent with the business requirements for handling this commodity. The project will also install a new Marine Vapor Combustion System (MVCS) for control of emissions from vapors displaced during the loading of marine vessels at the Main Terminal. The MVCS consists of one Dock Safety Unit (DSU) and one Marine Vapor Combustion Unit (MVCU).

The project site is approximately 822,069 square feet (18.64 acres) in size, with a construction disturbance area of approximately 83,650 square feet (1.9 acre).

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. [help]

The project site is located at 2565 NW Harborside Drive ("Main Terminal") at the Port and 5420 NW Fruit Valley Road ("Annex Terminal") in Vancouver, WA. The site occurs within portions of Sections 20, 21, 28, and 29, of Township 2N, Range 1E.

The Main Terminal is connected via piping to the Annex Terminal at 5420 NW Fruit Valley Road. Both terminals are currently used to receive commodities from various off-site sources and store them on site prior to shipment to other locations. The two terminals are connected by underground pipes, which allow the transfer of bulk liquid product between the two locations and the Main Terminal's dock at Berth 5. The project would not involve modifications to the Annex Terminal, other than inter-terminal piping modifications between the Main and Annex Terminals.

B. ENVIRONMENTAL ELEMENTS [help]

1. Earth

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

b. What is the steepest slope on the site (approximate percent slope)? [help]
According to the Clark County Developer's GIS Packet, the steepest slope on the site is approximately 25 percent at the shoreline of the Columbia River.

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 agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [help]
Soils mapped at the project site are characterized by the National Resources Conservation Service (NRCS) as Pilchuck fine sand (PhB), 0 to 8 percent slopes.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [help]
There are no surface indications of unstable soils in the immediate vicinity. However, maps included in the Clark County Developer's Packet indicate that site soils are mapped as having a moderate-to-high susceptibility for liquefaction.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. [help]
Installation of the new foundations, piping, pump pit, and rail relocations would result in about 1.9 acre of soil disturbance, primarily in the rail area, due to the reconfigured tracks. The project will require 5,191 (net) cubic yards of excavation to enable installation of new rail unloading platform foundations, the rail area pump pit, electrical room foundations, a vapor combustion unit foundation, pump foundations, and pipe supports.
The rail unloading platform will be supported by concrete foundations. The foundations will consist of a concrete bottom with square concrete pedestals. The concrete bottom will be poured the entire length of the rail unload platform and will serve to support the product trunk line. The platform foundation and concrete bottom will require excavation below existing grade. This work will be completed using backhoes to excavate to the required width and depth for placement of forms. Once the forms are installed and properly braced, reinforcing steel can be set and concrete will be poured. After the concrete bottom is completed, the concrete pedestals will be formed, reinforcing steel will be installed, and concrete will be poured.

The pump pit will consist of concrete side walls and a concrete floor. Excavations will be required and will be completed with a backhoe. Once the excavation is completed with adequate side slopes or shoring, forms will be installed, reinforcing steel will be tied, and concrete will be poured. Foundations for the three pumps will consist of a concrete support with a hole for inserting the pump can. This hole will be drilled by a machine mounted auger and will include a corrugated metal pipe inserted after drilling. Once the corrugated metal pipe is secured in place, forms and rebar will be placed and concrete will be poured.
The electrical room (MCC building) foundations will consist of a square spread footer with square pedestals. Excavation will be required and will be completed with a backhoe or mini-excavator. Following excavation, forms and reinforcing steel will be installed, and concrete will be poured. The vapor combustion unit foundation will also require excavation. The foundation consists of concrete and will support the vapor blower staging skid and the vapor combustor.

The new foundation for Tank 12001 will consist of concrete, and is located within a concrete containment area. The foundation will require minimal excavation of existing rock on top of the existing high density polyethylene (HDPE) liner.

The pipe support foundations required near Tank 12001 are also concrete with a pedestal. These supports require minimal excavation of existing rock on top of the existing HDPE liner.

All excavation would occur outside of the shoreline area. Any excess material would be transported to an off-site disposal area according to permit requirements, or in some cases, excavated material would be reused for fill according to the Port's approved methods.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [help]
Since the site is relatively flat and entirely impervious, erosion is not a major concern. The project will result in minimal soil exposure and excavated materials will be protected with plastic sheeting to prevent stormwater contamination during rain events.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [help]
The project site currently contains 100 percent impervious surfaces and will continue to have 100 percent impervious surfaces following its redevelopment.

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

The project will comply with the City of Vancouver's general requirements for erosion prevention and sediment control (VMC 14.24) and the Washington State Department of Ecology's Stormwater Management Manual for Western Washington. During construction, erosion and sediment control Best Management Practices (BMPs) will be employed for the project, as needed, including storm inlet protection, silt fence, and dust control.

2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. [help].

Construction of the proposed project will result in greenhouse gas (GHG) emissions. The GHGs most likely emitted include carbon dioxide, methane, and nitrous oxide. These emissions are expected to result from the use of heavy equipment, motor vehicle trips generated by construction workers, potential use of generators and small engines, and production of materials (e.g., steel and concrete) used in project construction. There also will be emissions of criteria pollutants (NO_x, CO, and particulate matter) generated from the combustion of fuel in the mobile equipment and electrical generators. Increases in emissions that may occur during construction will be minimal and temporary in nature, and are not expected to contribute substantially to overall GHG emissions. There may be minor quantities of dust generated for short periods of time. Appropriate dust control measures will be employed as needed.

The proposed conversion of existing equipment to receive ethanol will not increase the annual total emissions of volatile organic compounds above currently permitted levels. During operation of the proposed project, there will be a change of type of toxic air pollutants (TAPs) generated, but any changes will be less than regulatory thresholds requiring further analysis. Emission calculation is included with the SWCAA permit application. An amended Air Discharge Permit from SWCAA is being applied for concurrently with land use and engineering approval, and will be obtained prior to construction.
The proposed project is not anticipated to increase potential rail traffic beyond the permits of the previous methanol facility. In addition, marine vessel traffic is not expected to increase as a result of the project and the number of vehicular trips to and from the site from employee traffic, delivery traffic and truck traffic from carrier loading, will be comparable to the previous

commodity (methanol) and will remain within the average historic range for the site. Therefore, transportation-related air emissions increase are not expected to result from the project.

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

The site is surrounded by land zoned and used for heavy industrial operations, which are regulated by state guidelines on air quality. As a consequence, no emissions or odor from offsite sources are expected to affect this proposal.

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

Overall, the anticipated number of vessels and railcars at the completed facility will be similar to conditions while handling the previous commodity (methanol). NuStar will continue to comply with conditions of the amended Air Discharge Permit for the facility and with all applicable local, state, and federal air quality regulations.

A 98-percent plus destruction efficiency vapor combustion unit (VCU) will be used to abate vapor marine vessel loading emissions. At no time will the VCU be operated, other than during a marine vessel loading period.

3. Water

a. Surface Water: [help]

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. [help]

The proposed project is located at approximately river mile (RM) 105 of the Columbia River, a Type S (Shoreline) stream as defined per Washington Administrative Code (WAC) 222-16-030. Wetlands are known to exist on nearby Port properties, including at Port Parcel 1A, approximately 3,600 feet northwest of the site, and the Port's Columbia River Wetland Mitigation Bank, approximately 4,100 feet north/northwest of the site, at the Port's Parcel 6. Additionally, Vancouver Lake is located northwest of the project site, approximately 2 miles from the Main terminal and 1 mile from the Annex Terminal.

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. [help]

The project would not involve any in-water work. In the shoreline area, the following elements will take place within 200 feet of the ordinary high water mark (OHWM) of the Columbia River:

- *A Dock Safety Unit (DSU) will be placed on the existing marine transfer dock (berth 5) as part of the vapor control system for loading marine vessels. The DSU will be provided on a pre-fabricated, self-contained skid approximately 10 feet 6 inches by 15 feet 3 inches in dimension, with an overall height of approximately 8 feet. Vapors from the DSU will be transported from the dock via existing piping into the terminal. No modifications to the dock will be required to support this piece of equipment.*
- *A new natural gas line will be extended from within the terminal to the DSU. Natural gas piping to the DSU will utilize an existing casing (Figure 3) and pipe supports, which eliminates the need to trench across any Port roadway.*
- *Installation of the DSU and new natural gas piping will not require any trenching, grading, or soil disturbance within the shoreline area.*

No trenching, grading, or ground disturbance is required in the shoreline area. For this reason, the City has previously indicated that a shoreline permit is not required.

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. [help]
No fill or dredge material will be placed in or removed from surface water or wetlands for the proposed project.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [help]
No surface water withdrawal or diversions are proposed as a part of this project.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [help]
No. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Community Panel Number 5300270003B, dated August 17, 1981, the project site is located outside of the 100-year floodplain (elevation 31 feet).

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. [help]
The proposed project will not result in or require any discharge of waste materials to surface water.

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. [help]
No groundwater will be withdrawn and no water will be discharged to groundwater as a result of this proposed project.

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. [help]
No waste material will be discharged into the ground during construction or operation of the proposed project.

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. [help]
The project will not increase impervious surfaces or the amount of stormwater runoff. Existing drainage patterns will be maintained in their present configuration. The Main Terminal will continue to be served by the Port's existing drainage facilities and the City's POTW. The Annex Terminal will continue to be served by the Vancouver Public Sewer System.

The proposed MVCU and tank farm modifications would be located in areas with full containment systems that are capable of holding any spills or leaks that might occur as required by 40 CFR 112 (SPCC regulations) and NFPA 30. Runoff from these areas will continue to discharge into the Port's storm drain system.

Proposed stormwater management BMPs for the MVCU and tank farm areas include use of existing inlets equipped with a shutoff valve. Stormwater can only be released by manually opening the valves, which are normally closed.

Spill control protocols during railcar unloading will include the use of spill/drip pans under each railcar to capture any inadvertent drips or spills that may occur. The spill/drip pans will drain to an existing 1,000-gallon vaulted storage tank adjacent to the rail area; this tank can also pump to a 54,000-gallon aboveground tank (T-1900), adjacent to T-12001, for additional storage capacity, as may be needed from time to time. The railcar unloading system will be designed such that the hoses can be pumped empty so no ethanol will

remain in the hose. Any small drips or residual ethanol in the hose would be captured within the drip pans and would not be discharged to the ground surface. The underground tank will ultimately discharge to the City of Vancouver POTW after evaluation, under an existing permit that may be modified for additional capacity.

2) Could waste materials enter ground or surface waters? If so, generally describe. [help]
The proposed project would not result in the release of waste materials to ground or surface waters. The project site consists of impervious surfaces, and the site utilizes containment as a protection against accidental spills. The stormwater system has a shut-off valve used to check for pollutants prior to release to the port detention facility. This containment would prevent waste materials from entering ground or surface water.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.
The project will not increase impervious area or create new runoff. Existing drainage patterns will be retained on site.

4) Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:
Impacts to surface, ground, or runoff water are not expected to result from the project. Runoff from the site is either fully contained (in tank farm areas) and/or discharges through water quality treatment facilities.

4. Plants [help]

a. Check the types of vegetation found on the site: [help]
____deciduous tree: alder, maple, aspen, other
____evergreen tree: fir, cedar, pine, other
____shrubs
____grass
____pasture
____crop or grain
____Orchards,vineyards or other permanent crops.
____wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
____water plants: water lily, eelgrass, milfoil, other
____other types of vegetation
The project site is entirely paved with impervious surfaces and lacks vegetation. There is some limited vegetation along the banks of the Columbia River shoreline near the dock. However, work is not proposed along the banks and no vegetation would be impacted by the project.

b. What kind and amount of vegetation will be removed or altered? [help]

No vegetation would be altered or removed.

c. List threatened and endangered species known to be on or near the site. [help]
HDR biologists have visited the site and found no occurrences of threatened or endangered plant species on or near the site. According to the database of the Washington State Department of Natural Resources Natural Heritage Program, Western ladies' tresses (Spiranthes porrifolia), a plant species listed as state sensitive, is known to occur approximately 4 miles northwest of the project site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [help]
No landscaping is proposed for the project. As no vegetation exists on site, no measures will be taken to preserve or enhance vegetation on the site.

e. List all noxious weeds and invasive species known to be on or near the site.
There is no vegetation on-site. No noxious weeds or invasive species occur at the project site.

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: [help]

birds: hawk, heron, eagle, songbirds, other:
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other:

b. List any threatened and endangered species known to be on or near the site. [help]
Based on a site visit and review of the Washington State Department of Fish and Wildlife (WDFW) priority habitat and species (PHS) data, there are no threatened or endangered species known to occur within the project site boundary. However, some do occur near the site (within 2 miles), including sandhill cranes (Grus canadensis) and various fish species in the Columbia River.

Sandhill cranes are listed as endangered by the state of Washington, but are not listed by the federal government. Sandhill cranes are documented as occurring approximately 2 miles northwest of the proposed project in the Vancouver Lake Lowlands, and in agricultural lands at Columbia Gateway Parcel 3. These areas are used as stopover habitat during migration and for foraging by over-wintering cranes. Given the proximity of the project to these suitable habitats (2 miles away), the project is not expected to adversely affect sandhill cranes or their habitat.

The portion of the Columbia River that borders the project site is designated as critical habitat for:

- *Steelhead (threatened), Lower Columbia River distinct population segment (DPS)*
- *Chinook salmon(threatened), Lower Columbia River evolutionarily significant unit (ESU)*
- *Chum salmon (threatened), Columbia River ESU*
- *Bull trout (threatened), Columbia River DPS*

In addition, Green sturgeon (threatened) is known to occur within this portion of the Columbia River, but the river is not designated as critical habitat for Green sturgeon.

The project would not involve any in-water work, and the site has no surface water connections or outfalls. Erosion is not a major concern since the site is relatively flat, and excavation would not occur within the shoreline. Erosion control BMPs would be implemented during construction to further minimize the potential for erosion and sedimentation into nearby waters. Therefore, the proposed project is not anticipated to result in any impacts to Columbia River fish species or in-stream habitat.

c. Is the site part of a migration route? If so, explain. [help]
The proposed project site is within the Pacific Flyway, a broad migratory corridor that extends from Alaska to Central America, and is used by waterfowl, eagles, hawks, falcons, songbirds, sandhill cranes, and shorebirds (WDFW Management Recommendations for Washington's Priority Species, Volume IV; Birds). However, the proposed project site does not have any areas for foraging, and likely does not provide stopover habitat within the Pacific Flyway.

d. Proposed measures to preserve or enhance wildlife, if any: [help]
No threatened or endangered species are anticipated to be impacted by the proposed project. There would be no in-water work within the Columbia River, and the project site consists of impervious surfaces with no suitable habitat for species. Therefore, no measures are proposed to preserve or enhance wildlife as part of the proposed project.

e. List any invasive animal species known to be on or near the site.
No invasive animal species are known to occur on or near the site.

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. [help]
The proposed project will use electricity and natural gas for the completed facility.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. [help]
The proposed project will not obscure solar access to any adjacent properties.

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: [help]
No energy conservation features are included with the proposed project.

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. [help]

NuStar has numerous plans, policies, and procedures in place to reduce fire related hazards. These include:

- *Facility Operations Manual*
- *NuStar Vancouver Emergency Response Action Plan*
- *NuStar Vancouver Fire Pre-Plan*
- *Site-specific SPCC Plan*
- *NuStar Corporate Safety Policies and Procedures*
- *USCG procedures for the handling of flammable liquids*

All of the above-listed plans, policies, and procedures will be updated as needed for ethanol. In addition, NuStar completes annual fire & safety training for all personnel associated with the terminal including fire extinguisher trainings, evacuation/fire drills, and trainings with the VFD to test the terminal plans and fire department equipment.

The new rail rack will be equipped with a fixed fire detection, alarm, and suppression system similar to the existing rail rack, which will meet the intent of the Fire Code. The VFD received training on the management of polar solvent emergencies as part of the previous methanol project. NuStar is prepared to provide similar training near the completion of this project, as an introduction to the new rail loading rack, and a refresher on the handling of polar solvent emergencies. The VFD will review onsite measures to ensure they are appropriate for the proposed product. Fire suppression techniques will be inspected prior to operation of the ethanol facility.

Due to the change in commodity, NuStar is required to obtain a new IFC Operational Permit and a Hazardous Material Regulatory Fee Certificate from the VFD. As part of the application for an updated operational permit, NuStar is required by the VFD to fund the completion of a third party Fire Operations Impact Assessment and Gap Analysis Study, and a Fire Protection Systems Review by third party Fire Protection Engineer (FPE). Both of these studies are described in detail below and will be subject to VFD review and approval prior to issuance of the fire permits. NuStar will apply for the IFC operation permit and Hazardous Material Regulatory Fee Certificate prior to construction and commencement of operations. NuStar requests that the IFC Operational permit and Hazardous Material Regulatory Fee Certificate be granted as a condition of approval of land use and engineering review.

Fire Operation Impact Study and Gap Analysis

The Fire Operations Impact Assessment and Gap Analysis Study will address fire protection and public safety related impacts and risks from:

- *NuStar's Port of Vancouver Facility, and Annex Facility to the extent involved in inter-site transfer of product to and from both sites.*
- *Proposed change in product, throughput capacity, direction of flow, or product transfer methods.*
- *Fire and spill protection systems for the proposed facilities and operations, including firefighting water supply and fixed foam systems.*
- *Off-site exposures, within the VFD's service area and area of responsibility for Hazardous Materials Response within Clark County, including but not limited to these portions of the Columbia River, neighboring Port facilities, and off-site public safety impacts to the community.*
- *Proposed transportation systems, within the VFD's service area and area of responsibility for Hazardous Materials Response within Clark County, including but not limited to truck transportation over local roadways, rail transportation over local railways, marine transportation over local waterways, and pipeline transportation.*

The study will also include a Gap Analysis, which will analyze the Project's effect on the VFD's ability to provide emergency response services, including, but not limited to, the VFD's capabilities (e.g., spill response, flammable liquids firefighting, marine firefighting, confined space rescue, etc.) and preparedness (e.g., training, planning, equipment, etc.) to

provide emergency response services to the proposed facilities and related transportation systems, and to identify any gaps where mitigation measures may be required. In addition, the study will recommend mitigation measures for the project's impacts on the VFD's ability to provide emergency response services, and to address any gaps in capabilities or preparedness.

Fire Protection Systems Review

NuStar has also agreed to fund a third party Fire Protection Engineer (FPE), acceptable to the Fire Code Official, to review fixed fire protection system design submittals and acceptance testing on behalf of the VFD. This FPE will work directly for the VFD as a contract fire plans examiner to ensure code and design standard compliance. The third party FPE will also review existing fire protection systems expected to be utilized in this project and perform an in-depth FPE review for VFD.

1) Describe any known or possible contamination at the site from present or past uses.

   There are two restrictive covenant sites in the project area.

   1) Within NuStar's lease area, the site is subject to an Agreed Order with Ecology from the previous facility owner regarding clean up actions for contaminated soil and groundwater on portions of the terminal. The area of the proposed project within NuStar's lease area is not located in an area where soil contamination is known to occur. However, groundwater in the project area is identified as being above Method A Level for the chemicals of potential concern. Previous preliminary geotechnical investigation prepared by PSI, Inc. indicates typical groundwater elevations are approximately 20 feet below the surface on the project site. This project will not contain excavation that would reach groundwater level in this area.

   2) A restrictive covenant site is located east of NuStar's leashold (on north side of buildings 2305 and 2245) at a former Carborundum Plant and Pond site. Some soil disturbance will be required in this area during construction of rail improvements. Disturbance of the asphalt cap in this area will require approval from the Washington Department of Ecology.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

Existing hazardous chemicals and conditions at the project site include underground, natural gas pipelines and miscellaneous, bulk liquid commodities that are currently stored and transferred on site.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.
The proposed project will convert existing facilities to handle a new material (ethanol), which is volatile and flammable. Upon project completion, ethanol will be received, stored, handled, and transferred at NuStar's facilities.

4) Describe special emergency services that might be required.
The structures on the site would require a response from the VFD in the event of a fire. The VFD received training on the management of polar solvent emergencies as part of the previous methanol project. NuStar is prepared to provide similar training near the completion of this project, as an introduction in the new rail loading rack, and a refresher on the handling of polar solvent emergencies. NuStar has agreed to fund a third party Fire Operations Impact Assessment and Gap Analysis Study, which will analyze the Project's effect on the VFD's ability to provide emergency response services, including, but not limited to the VFD's capabilities (e.g., spill response, flammable liquids firefighting, marine firefighting, confined space rescue, etc.) and preparedness (e.g.., training, planning, equipment, etc.) to provide emergency response services to the proposed facilities and related transportation systems, and to identify any gaps where mitigation measures may be required. In addition, the study will recommend mitigation measures for the project's impacts on the VFD's ability to provide emergency response services, and to address any gaps in capabilities or preparedness.

Additionally, terminal facilities are covered by the Marine Fire and Safety Association Emergency Spill Response Program, which covers the entire Port Terminal and provides response capability for any in-water emergency.

NuStar also contracts with an Oil Spill Response Organization (OSRO) with full emergency response capabilities for a worst case discharge scenario. The organization provides support throughout the Columbia River and trains with the NuStar facility on a frequent basis.

The VFD has agreed that prior to engineering approval the VFD must approve the study, and that any agreements for fire fighting equipment and training that result from it will be updated at that time.

The VFD will review onsite measures to ensure they are appropriate for the proposed product. Fire suppression techniques will be inspected prior to operation of the ethanol facility.

5) Proposed measures to reduce or control environmental health hazards, if any:
The project includes design measures to minimize any potential spills, including use of an existing containment wall around existing tank structures. As part of the project, the terminal's Facility Response Plan and SPCC Plans will be updated to reflect the change in commodity and any differing requirements of ethanol versus methanol. While the commodity is changed relating to this project, the storage and piping systems have the same design specifications for containing and controlling liquid material. The updated Facility Response Plan for marine facilities and ship loading operations will specify the procedures to be taken if a spill of hazardous materials were to occur at the berth.

NuStar has numerous policies and procedures in place to reduce fire related hazards. These include:

- *Facility Operations Manual*
- *NuStar Vancouver Emergency Response Action Plan*
- *NuStar Vancouver Fire Pre-Plan*
- *Site-specific SPCC Plan*
- *Nustar Corporate Safety Policies and Procedures*
- *USCG procedures for the handling of flammable liquids*

All of the above-listed policies are updated as needed. In addition, Nustar completes annual fire & safety training for all personnel associated with the terminal including fire extinguisher trainings, evacuation/fire drills, and trainings with the VFD to test the terminal plans and fire department equipment.

NuStar has agreed to fund the completion of a third party Fire Operations Impact Assessment and Gap Analysis Study, which will address fire protection and public safety related impacts and risks, and will analyze the project's effect on the VFD's ability to provide emergency response. The study will recommend mitigation measures for the project's impacts on the VFD's ability to provide emergency response services, and to address any gaps in capabilities or preparedness. The VFD and NuStar have agreed that, prior to engineering approval, the VFD must approve the Fire Operations Impact Study and that any agreements that result from the study, relative to fire fighting equipment and training, will be updated at that time.

Because of the past use of the project site and existing clean up action

occurring nearby, soil excavated (if any) during the project implementation will be monitored for the potential presence of contamination. Soil will be characterized as necessary and disposed of accordingly.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [help]
In the area of the project, the surrounding industrial operations and operating rail yards produce noise. The existing noise level is expected in an industrial area, is consistent with ordinary noises, and will not affect the project.

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. [help]
Construction of the project would result in temporary, short-term noises due to construction machinery and truck traffic. Construction activities may occur 7 days a week during the hours allowed by the City (7:00 am to 8:00 pm). Operation of the project would result in long-term noise levels similar to existing noise levels in the vicinity. Operational noise would be generated by vehicles, rail cars, and marine vessels transporting ethanol to and from the site. No increase in operational noise levels is anticipated to result from the project. Since the project site is surrounded by industrial properties at the Port, no offsite noise impacts are anticipated.

3) Proposed measures to reduce or control noise impacts, if any: [help]
Since no noise impacts are anticipated, no mitigation is proposed. All construction equipment will have mufflers consistent with manufacturer's specifications and applicable federal, state, and local requirements.

8. Land and shoreline use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [help]
Currently, the site is used for storage and transfer of liquid materials to and from marine vessels and railroad liquid storage cars. Adjacent properties include the Terminal 2 and Terminal 3 Port properties to the east and west, and Burlington Northern Santa Fe (BNSF) rail lines to the north. The proposal will not affect adjacent land uses, other than potential noise impacts during construction, which would be minor and temporary in nature and would not interfere with or impede industrial operations.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance

will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? [help]
No, the project site has not been used as working farm land or forest land. The project does not involve any conversion of land uses.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:
No, surrounding land uses are industrial.

c. Describe any structures on the site. [help]
Existing structures at NuStar's Main Terminal include five storage buildings, multiple (51) storage tanks, a process boiler, BNSF rail tracks, six truck/railcar loading racks, a marine dock and marine loading rack, and one vapor combustion unit. Existing structures at the Annex Terminal include storage buildings, storage tanks, pumps, piping, and truck delivery racks.

d. Will any structures be demolished? If so, what? [help]
No, no structures will be demolished.

e. What is the current zoning classification of the site? [help]
The site is zoned Heavy Industrial (IH) under the City of Vancouver's Municipal Code (VMC Title 20). The proposed uses are permitted within the IH zoning district.

f. What is the current comprehensive plan designation of the site? [help]
The site is designated industrial (IND) under the City's comprehensive plan.

g. If applicable, what is the current shoreline master program designation of the site? [help]
The Columbia River shoreline at the project site is designated as High Intensity under the City's Shoreline Management Program.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [help]
Critical Areas include habitats of local importance (VMC 20.740.100), fish and wildlife habitat conservation areas (VMC 20.740.110), frequently flooded areas (VMC 20.740.120), geologic hazard areas (VMC 20.740.130), and wetlands (VMC 20.740.140). Critical areas at the project site were determined through review of the Clark County Developer's GIS Packet, Clark County maps online, Federal Emergency Management Agency (FEMA) floodplain maps, and various geotechnical reports that document site conditions at NuStar's Main Terminal. Site visits performed

for previous geotechnical reports were performed in August 2012, August 2013, January 2015, and most recently in December 2015. Based on review of these sources, the only critical areas determined to be present within the project site are geologic hazard areas related to seismic hazards.

The entirety of the project area is mapped as having a moderate to high liquefaction susceptibility and is within the National Earthquake Hazards Reduction Program (NEHRP) site classes B-C, C, and C-D. Based on the definitions provided in VMC 20.740.130 (A)(2), the site is designated as a seismic hazard area, subject to liquefaction or dynamic settlement and ground shaking amplification. A geotechnical report was completed by PSI Inc. (2012) to address any liquefaction concerns during design and construction. Since the geotechnical report was prepared in 2012, site conditions have not changed and an updated geotechnical report is not required (see pre-application conference meeting notes in Appendix A).

The project site is within a mapped Riparian Management Area (RMA) that extends 100 feet from the OHWM of the Columbia River. However, under the City's Critical Area Ordinance, the regulated riparian area may be adjusted to reflect site conditions, particularly in areas where impervious surfaces functionally isolate the riparian area from the waterbody (VMC 20.740.110.A.1.e.1.A). The project site does not function as riparian habitat, as it is 100 percent impervious surfaces and devoid of vegetation. All work would occur landward of the OHWM (17 feet 4 inches in elevation; as shown in Clark County maps online and the Developer's Packet). Therefore, due to the lack of riparian habitat within the project area, the project site is not considered to be within a regulated RMA.

Other critical areas, such as wetlands and floodplains, do not occur on the site. Floodplain mapping shows the site to be outside of the FEMA 100-year floodplain (FIRM Map #5300270003B), which is at an elevation of 31 feet. The site is entirely impervious and lacks vegetation, wetlands, wildlife habitat, etc.

i. Approximately how many people would reside or work in the completed project? [help]
No one will reside within the completed project. It is anticipated that the project, including proposed project refinements, will result in approximately 2 to 6 additional employees.

j. Approximately how many people would the completed project displace? [help]
The proposed project will not displace any workers or residents on or near the site.

k. Proposed measures to avoid or reduce displacement impacts, if any: [help]
The proposed project will not displace any workers or residents on or near the site. Therefore, no avoidance measures are proposed.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [help]
The proposed project uses are appropriate for the site and permissible under its industrial comprehensive plan and IH zoning designations. The project will be consistent with the applicable standards of the VMC (including VMC Section 20.440.040), and will ensure that future development is designed to be compatible with adjoining uses.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:
Since surrounding land uses are industrial, farm or forest lands would not be affected by the proposed project.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [help]
No new housing units are proposed.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [help]
No housing units would be eliminated.

c. Proposed measures to reduce or control housing impacts, if any: [help]
The project would not add, remove, or otherwise impact housing. Therefore, minimization measures are not needed or proposed.

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? [help]
Proposed structures include a new rail unloading station, equipped with a rail access platform, and the VCU. The proposed rail access platform has elements that may be up to 25 feet in height. The height of the proposed VCU will be determined by the manufacturer during later stages of design, but is expected to be approximately 35 feet in height.

b. What views in the immediate vicinity would be altered or obstructed? [help]
The proposed project will not be located within the viewshed of any occupied structures. The completed project will be visible from the surrounding industrial port properties, but will be consistent with the industrial character of the site, and will not obstruct any scenic views.

c. Proposed measures to reduce or control aesthetic impacts, if any: [help]
The project would not result in changes to the visual quality and character of the industrial project site and surrounding properties. Therefore, measures to reduce or control aesthetic impacts are not needed or proposed.

11. Light and glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [help]
The proposed rail access platform would be equipped with directional lighting (surface-mounted LED fixtures) to illuminate the top railcar hatches and under belly hose connection fittings. In addition, pole-mounted LED floodlights are proposed in the rail unloading area, tank farm area, and Berth 5 dock area. Lighting would be used during all non-daylight hours.

b. Could light or glare from the finished project be a safety hazard or interfere with views? [help]
Proposed lighting fixtures are intended as a safety measure, and views from the surrounding Port properties will remain unobstructed as a result of proposed lighting.

c. What existing off-site sources of light or glare may affect your proposal? [help]
No existing offsite sources of light or glare are anticipated to affect the proposed project. The influence of offsite light or glare is generally not a major concern for the type of project being proposed.

d. Proposed measures to reduce or control light and glare impacts, if any: [help]
Impacts are not anticipated. Therefore, measures to reduce or control light and glare impacts are not proposed.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity? [help]
Portions of the Columbia River provide recreational opportunities such as boating, waterskiing, fishing, etc. Most of these activities occur southeast and west of the project site, away from the Port's property. The Columbia River shoreline immediately adjacent to the project site is closed off to the public for safety and security reasons. As a result, the shoreline adjacent to the site does not provide formal or informal recreational opportunities.

b. Would the proposed project displace any existing recreational uses? If so, describe. [help]
No. The project will not displace any recreational uses.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [help]
Since the project will not displace or impact recreational uses, no mitigation measures are proposed.

13. Historic and cultural preservation

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. [help]
There are no historic resources that are listed, or are eligible for listing, on preservation registers that are known to occur on or near the site.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [help]
The proposed site and surrounding properties have been altered significantly from past industrial activities. As a result, there are no landmarks or evidence of historic archaeological, scientific, or cultural importance at the project site.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]
CH2M HILL has previously performed an archaeological review of the project area; the report is confidential and on file at the City of Vancouver (Case # ARC2006-00062). As indicated in the pre-application conference (PAC) notes, this report is acceptable and no additional archaeological review is required for the project. Based on previous archeological and historic studies that have been completed in the project area, there are no resources of archeological or historic significance that are known to occur on or near the proposed project site boundary.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.
If any unknown archaeological resources are encountered during construction, ground-distributing activities will be halted in the area of the find in accordance with Revised Code of Washington (RCW) 27.53.060 (Archaeological Sites and Resources) and RCW 27.44.020 (Indian Graves and Records). A Professional Archaeologist will be contacted to assess the significance of the find, and the Washington State Department of Archaeology and Historic Preservation in Olympia will be notified so that a course of action can be implemented.

14. Transportation

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. [help]
The site is accessed through NW Harborside Drive and West 26th Avenue.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? [help]
Public transit does not serve the site directly. C-TRAN Route 25 is the transit route closest to the project site. It travels on West Mill Plain Boulevard and Fruit Valley Road, approximately 0.5 mile northeast of the project.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [help]
The existing site contains 18 parking spaces. No parking spaces would be added or eliminated for the project.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). [help]
The proposed project will not require any new or improved roads or streets.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [help]
The commodity will arrive at the terminal through the use of existing rail and water transportation pathways. The commodity will arrive at the existing NuStar facility at the Port via unit train. Sixteen railcars at a time will be transferred to the unloading area. Ethanol will be pumped from the railcars to tanks T-12001 and T-12002, stored temporarily, and then transferred to tanker trucks and marine vessels for shipment by the regional highway systems or Columbia River.

The proposed project is not anticipated to increase potential rail traffic beyond the permits of the previous methanol facility. Rail traffic associated with the proposed project is within the current capacity of the rail line.

The Columbia River navigation channel will continue to be used for marine vessel transportation of materials to/from the site. Although the commodity would primarily arrive at the NuStar facility via rail, marine receipts would occur as the Low Carbon Fuel Standard regulations change over time to require additional volumes of low Carbon Intensity (CI) fuels into the market.
Marine vessel traffic is not expected to increase as a result of the project.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [help]
Truck traffic from carrier loading will be comparable to the previous commodity (methanol), at 10 to 20 trucks per day.

Traffic volumes at the site are inherently variable and subject to minor periodic fluctuations resulting from changes in contracts, commodities, and workload. Current vehicle traffic is approximately 25 to 50 trips per day, depending on employee schedules and day-to-day fluctuations in the number of deliveries. However, higher traffic volumes have previously been observed, when the site was operating at full capacity. After project approval, it is anticipated that there would be nominal increases in the number of employees (approximately 2 to 6 new employees) and commercial deliveries (e.g., UPS or FedEx [approximately 2 per day]); however, the number of vehicle trips per day would remain within the average historic range for the site. Deliveries would likely occur during typical business hours (7am to 7pm), whereas employee trips would occur throughout all hours of the day, and vary from day-to-day, to accommodate 24/7 operations at the project site. Construction traffic will also occur, but will be temporary, and will not result in significant changes to traffic in the area. As indicated in the PAC notes, traffic concurrency requirements per VMC 11.70 and 11.80 are not required to be met by the project.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.
The project would not interfere with the movement of agricultural or forest products in the area.

h. Proposed measures to reduce or control transportation impacts, if any: [help]
Both the railway and marine waterway are currently used by this facility for liquid transport and the project is not expected to increase rail or marine vessel traffic above previous allowed levels. The number of vehicle trips per day would remain within the average historic range for the site, and would have no impact on existing transportation facilities and local or regional traffic.

Additionally, the current means of supplying the daily ethanol demand is by single car manifest traffic, delivered throughout the

Portland/Vancouver area. Single manifest means that individual cars can arrive one at a time from different trains. The proposed project will replace and consolidate some of the existing single car manifest rail traffic into a more efficient transportation process. Further, the amount of railcars staged in sidings in the region as a part of the manifest traffic process will be reduced, as unit trains have priority on the rail system and would be moved directly to the end destination in the Port without being staged at several local rail yards along the transportation corridor. This type of efficiency reduces the number of times a car is handled, and therefore, reduces emissions from the movement of locomotives as well as the number of moves a railcar makes, which in turn improves the safety of the operation as a whole.

15. Public Services

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

Fire and police protection are currently provided to the site. Due to the change in commodity, NuStar is required to obtain a new IFC Operational Permit and a Hazardous Material Regulatory Fee Certificate from the VFD. As part of the application for an updated operational permit, NuStar has agreed to fund the completion of a third party Fire Operations Impact Assessment and Gap Analysis Study, which will be subject to VFD review and approval prior to issuance of the fire permits.

The study will also include a Gap Analysis, which will analyze the project's effect on the VFD's ability to provide emergency response services, including, but not limited to the VFD's capabilities (e.g., spill response, flammable liquids firefighting, marine firefighting, confined space rescue, etc.) and preparedness (e.g., training, planning, equipment, etc.) to provide emergency response services to the proposed facilities and related transportation systems, and to identify any gaps where mitigation measures may be required. In addition, the study will recommend mitigation measures for the project's impacts on the VFD's ability to provide emergency response services, and to address any gaps in capabilities or preparedness.

The VFD and NuStar have agreed that, prior to engineering approval, the VFD must approve the Fire Operations Impact Study and Gap Analysis, and that any agreements that result from the study, relative to fire fighting equipment and training, will be updated at that time.

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

An updated Fire Operations Impact Study and Gap Analysis Study are being prepared for the project and will be submitted to the Vancouver Fire Department (VFD) for review and approval. The VFD has agreed that the study can be completed concurrently with the land use and engineering application process. Prior to engineering approval, the VFD will approve the study and NuStar and the VFD will formulate an agreement relating to fire fighting equipment and/or training necessary. Due to the change in commodity, NuStar is required to obtain a new IFC Operational Permit and a Hazardous Material Regulatory Fee Certificate from the VFD.

16. Utilities

a. Circle utilities currently available at the site: [help]
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

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. [help]

The site will require electricity and natural gas for the operation of the facility and water service for fire protection systems (i.e., fire hydrants). The existing services are adequate to serve the proposed use.

C. SIGNATURE [HELP]

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: CREP

Name of signee: Chad Edinger

Position and Agency/Organization: VIce President

Date Submitted: 6/1/2016

D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS [help]

(**IT IS NOT NECESSARY** to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

   Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

   Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

   Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

   Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

   Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

NuStar Biofuel Conversion
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