

Tesoro Anacortes Clean Products Upgrade Project ENVIRONMENTAL IMPACT STATEMENT



Final

July 2017



Front cover: Looking south at Padilla Bay, March Point, and Fidalgo Bay
Source: Washington State Department of Ecology





July 10, 2017

Dale Pernula, AICP
Skagit County Planning and Development Services
1800 Continental Place
Mount Vernon, WA 98273

Dear Interested Parties, Jurisdictions, Tribes, and Agencies:

Skagit County is pleased to present the Final Environmental Impact Statement (Final EIS) for the proposed Tesoro Clean Products Upgrade Project. Tesoro Refining and Marketing Company (the Applicant) is proposing to construct and operate the Clean Product Upgrade Project at the Tesoro Anacortes Refinery in Anacortes, Washington.

Under the Proposed Action, the Applicant would construct additions and upgrades to its existing facility in Anacortes in order to produce 15,000 barrels per day of mixed xylenes and to supply cleaner local transportation fuels. Mixed xylenes are compounds found in gasoline, and used to make clothing, plastics and other synthetic products. Tesoro expects that the Proposed Action will increase marine vessel traffic by approximately 5 vessels per month. The Proposed Action includes:

- Building a Marine Vapor Emissions Control system to capture vapors at the refinery wharf
- Constructing an Aromatics Recovery Unit to produce mixed xylenes
- Adding an Isomerization Unit to make additional light hydrocarbons and increase the amount of octane available to the refinery
- Expanding the Naphtha Hydrotreater to remove more sulfur from gasoline
- Installing a steam boiler to provide additional energy for xylene extraction
- Installing three new aboveground storage tanks

As required under the State Environmental Policy Act (SEPA), RCW 43.21C, and its implementing regulations, WAC 197-11, and Skagit County Code, Skagit County prepared the Final EIS to evaluate the potential environmental impacts of constructing and operating the Proposed Action. The Final EIS includes a summary of the public comments received on the Draft EIS with responses, makes factual corrections to the Draft EIS, and provides additional analyses and information in response to public comments.



The following resource areas were evaluated in the Draft EIS:

- Geologic Resources
- Air Quality, Greenhouse Gases, and Climate Change
- Freshwater Resources
- Terrestrial Vegetation and Wildlife
- Marine and Nearshore Resources
- Energy and Natural Resources
- Environmental Health
- Land and Shoreline Use
- Social and Economic Environment
- Cultural Resources
- Marine Transportation

The Draft EIS also evaluated potential cumulative environmental impacts from the Proposed Action, including activities associated with marine vessel transportation and the potential risks associated with spills. In addition, a “no action” alternative was evaluated in the Draft EIS, which assumed the Proposed Action would not be built.

In the Final EIS, additional information regarding the following resource areas was evaluated:

- Air Quality, Greenhouse Gases, and Climate Change
- Terrestrial Vegetation and Wildlife
- Marine and Nearshore Resources
- Environmental Health
- Social and Economic Environment
- Cultural Resources
- Marine Transportation

The Final EIS also identifies mitigation measures to address potential environmental impacts of the Proposed Action. The Final EIS may be used by local and state agencies to inform permit decisions for the Proposed Action. Seven days following publication of the Final EIS, permits for the Proposed Action may be issued based on the regulatory requirements for each permit process. Construction of the Proposed Action could begin in 2017.

Thank you for your interest in the Tesoro Anacortes Refinery Clean Products Upgrade Project environmental review process.

Sincerely,

Dale Pernula, AICP, Director
Skagit County Planning & Development Services

Tesoro Anacortes Clean Products Upgrade Project ENVIRONMENTAL IMPACT STATEMENT

FINAL

***Skagit County
Planning and Development Services***



Prepared by ERM on July 10, 2017
Project No. 0337101

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Project Title

Tesoro Anacortes Clean Products Upgrade Project (CPUP)

Project Description

Tesoro Refining & Marketing Company LLC (Tesoro) is proposing infrastructure additions and upgrades to their existing Tesoro Anacortes Refinery (refinery) to produce 15,000 barrels per day of mixed xylenes along with lower sulfur transportation fuels. The U.S. Environmental Protection Agency (USEPA) is requiring refineries to produce cleaner transportation fuels, termed Tier 3 fuels, and specifically, that refineries produce gasolines with a lower level of sulfur beginning January 1, 2017.

Mixed xylene is a compound found in gasoline and is used to make clothing, plastics, and other synthetic products. The mixed xylenes would be loaded onto marine vessels using the existing refinery wharf structure, and exported to global markets. Tesoro anticipates approximately five additional vessels a month would be needed to support the production and shipment of mixed xylenes.

The proposed project involves expansion/construction and operations of the following components within the refinery:

Project components to produce lower sulfur fuels:

- Expand the naphtha hydrotreater (NHT) to remove additional sulfur in the refining process.
- Install an Isomerization (Isom) Unit to transform hydrocarbons into higher-octane gasoline components for blending.

Project components to produce xylenes:

- Install an aromatics recovery unit (ARU) to produce 15,000 barrels per day of mixed xylenes.
- Install a steam boiler for additional energy needed to run the new process units.
- Install a Marine Vapor Emission Control (MVEC) System to capture vapors during product loading from docked marine vessels. The MVEC System consists of two physical components: the Dock Safety Unit (DSU) located on the refinery wharf structure and the Vapor Combustion Unit (VCU) located onshore.
- Install three storage tanks in the New Tanks Area (to store reformat and mixed xylenes).

The project would be located at the existing Tesoro Anacortes refinery property, 70 miles north of Seattle on the northern half of the March Point peninsula on Fidalgo Island in western Skagit County. The proposed project site has been a refinery since 1955, and Tesoro acquired it in 1998.

The refinery currently has a total crude oil processing capacity of approximately 120,000 barrels per day. The proposed project would not change the amount of crude oil received at the facility, via pipeline and rail.

Tesoro's objectives for the proposed project are to improve the refinery's capability to deliver cleaner gasoline per USEPA requirements and to enable the refinery to produce mixed xylenes feedstock.

A no action alternative was evaluated in this Draft Environmental Impact Statement (EIS). Chapter 1, Project Summary, of this Final EIS provides a description of this alternative.

Project Proponent

The project proponent is the Tesoro Refining & Marketing Company LLC (Tesoro). The projected date of completion for the proposed project is between 2017 and 2018.

Project Proponent Contact Information

Tesoro Refining & Marketing Company LLC
PO Box 700
Anacortes, WA 98221-0700

Lead Agency and Responsible Official

Skagit County is the lead agency.

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Mount Vernon, WA 98273

Authors and Principal Contributors

Chapter 14, List of Preparers, of the Draft EIS identifies the personnel who contributed materially to the preparation of the Draft EIS.

Date of Issue and Availability of the Draft EIS

The Draft EIS was issued March 23, 2017. It was available for viewing at several public reading rooms around the state. Chapter 15, Distribution List, of the Draft EIS provides a list of public reading room locations.

The Draft EIS is available for download at the project website: www.tesoroanacorteseis.com. To obtain a printed copy of the Draft EIS, call (360) 416-1323 or email info@tesoroanacorteseis.com (for the cost of production and shipping).

Accommodations for limited English proficiency populations are available at www.tesoroanacorteseis.com. To request materials in alternate formats, follow the instructions at www.tesoroanacorteseis.com.

Comments on the Draft EIS

The public comment period for the Draft EIS was March 23, 2017, through May 8, 2017. Comments were submitted by mail, online, through hand delivery, by phone, and through testimony at the Draft EIS hearing. Comments were treated equally regardless of submittal method. Additional information is included in Chapter 2, Comments and Responses, and Appendix A, Draft EIS Comments and Responses, of the Final EIS.

Date and Location of Draft EIS Public Hearing

Skagit County hosted an open house at Anacortes High School on April 17, 2017, from 4 pm – 8 pm. A lottery system was used to determine speakers. Information about the Draft EIS and its findings was also presented at the hearing.

Date of Issue of Final EIS

The date of issue of the Final EIS is July 10, 2017.

Availability of the Final EIS

The Final EIS will be available for viewing at several public reading rooms around the state. Section 15.2, Public Reading Rooms, of the Draft EIS provides a list of public reading room locations.

The Final EIS is available for download at the project website: www.tesoroanacorteseis.com. To obtain a printed copy of the Final EIS, call (360) 416-1323 or email info@tesoroanacorteseis.com (for the cost of production and shipping).

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Agency Action and Projected Date of Action

After completion of the EIS, Tesoro will need to obtain permits and authorizations to construct and operate the proposed project. Agencies can use the EIS when making permitting decisions. Chapter 1, Introduction, of the Draft EIS provides a summary of the anticipated permits and approvals that would be needed to implement the proposed project.

Subsequent Environmental Review

There are no subsequent environmental reviews expected at this time.

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Acronyms and Abbreviations

$\mu\text{g}/\text{m}^3$: microgram per cubic meter	NHT: Naphtha Hydrotreater
μm : micrometer	NMFS: National Marine Fisheries Service
AAQS: Ambient Air Quality Standards	NOAA: National Oceanic Atmospheric Administration
AEGL-1: Acute Exposure Guideline Levels 1	NOAEL: No Observed Adverse Effect
ARU: Aromatics Recovery Unit	NO_x : nitrogen oxides
ASIL: acceptable source impact level	NPDES: National Pollutant Discharge Elimination System
ATB: articulated tug barge	NRHP: National Register of Historic Places
BACT: best available control technology	NWCAA: Northwest Clean Air Agency
bbbl: barrel	OPA 90: Oil Pollution Act of 1990
BLM: Bureau of Land Management	ORNL: Oak Ridge National Laboratory
bpd: barrels per day	OSCP: Oil Spill Contingency Plan
CAR: Clean Air Rule	PEL: permissible exposure limit
CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act	PIC: person in charge
CFR: Code of Federal Regulations	$\text{PM}_{2.5}$: particulate matter less than 2.5 microns in diameter
CHP: combined heat and power	PM_{10} : particulate matter less than 10 microns in diameter
CO_2 : carbon dioxide	ppb: parts per billion
CO_{2e} : carbon dioxide equivalent, standard unit	ppm: parts per million
CSB: U.S. Chemical Safety and Hazard Investigation Board	RCW: Revised Code of Washington
CWA: Clean Water Act	refinery: Tesoro Anacortes Refinery
DPS: Distinct Population Segment	SEPA: State Environmental Policy Act
Ecology: Washington State Department of Ecology	SO_2 : sulfur dioxide
EFH: essential fish habitat	SPCC: Spill Prevention, Control, and Countermeasures
DOSH: Washington State Department of Labor and Industries, Division of Occupational Safety and Health	SPMT: self-propelled modular transporter
EIS: Environmental Impact Statement	SWPPP: Stormwater Pollution Prevention Plan
ERU: emissions reduction unit	TESC: temporary erosion and sediment control
GHG: greenhouse gas	Tesoro: Tesoro Refining & Marketing Company LLC
GNOME: General NOAA Operational Modeling Environment	TWA: time weighted average
GRP: Geographic Response Plan	USCG: United States Coast Guard
IPaC: Information for Planning and Consultation	USEPA: United States Environmental Protection Agency
km: kilometer	USFWS: U.S. Fish and Wildlife Service
LC_{50} : lethal concentration 50	VOC: volatile organic compound
LEPC: Skagit County Local Emergency Planning Committee	VTRA: Vessel Traffic Risk Assessment
LOAEL: Lowest Observed Adverse Effect Level	WAC: Washington Administrative Code
MARPOL: International Convention for the Prevention of Pollution from Ships	WDFW: Washington State Department of Fish and Wildlife
mg/L: milligrams per liter	WISHA: Washington Industrial Safety and Health Act
mph: miles per hour	WDNR: Washington State Department of Natural Resources
Monument: San Juan Islands National Monument	
MVEC: Marine Vapor Emissions Control	
NAAQS: National Ambient Air Quality Standards	

WSDOT: Washington State Department of
Transportation

WSF: Washington State Ferries

WWTP: Wastewater Treatment Plant

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1. PROJECT SUMMARY

This Final Environmental Impact Statement (Final EIS) was developed in response to public comments received on the Draft Environmental Impact Statement (Draft EIS) for the proposed Tesoro Anacortes Clean Products Upgrade, published March 23, 2017. Skagit County, as the lead agency, provided oversight for the preparation of this Final EIS in accordance with the State Environmental Policy Act (SEPA). Detailed information on the SEPA EIS process is available on the Washington State Department of Ecology (Ecology) website at: <http://www.ecy.wa.gov/programs/sea/sepa>.

Tesoro Refining & Marketing Company LLC (Tesoro's) objectives for the proposed project are to improve the Tesoro Anacortes Refinery's (refinery's) capability to deliver cleaner gasoline per U.S. Environmental Protection Agency (USEPA) requirements and to enable the refinery to produce mixed xylene feedstocks.

The USEPA has adopted new, more stringent fuel standards that require lowering the sulfur content in gasoline, which went into effect January 1, 2017. The proposed project would install upgrades at the refinery to comply with the upcoming federal fuel standards for reduced-sulfur gasoline in a manner that is economically viable for the operation of the refinery. These new fuel standards are referred to by the USEPA as "Tier 3" standards. The upgrades would lower the sulfur content in gasoline (resulting in cleaner fuel) and consequently reduce the amount of sulfur emissions from automobiles combusting this gasoline.

The proposed project would also enable the refinery to produce mixed xylenes feedstock which would diversify the refinery's product mix, achieving two objectives. First, it would increase the value of products produced by the refinery, increasing both employment and economic value. Second, a more diverse product mix increases the long-term economic viability and financial security of the refinery.

1.1. PROJECT DESCRIPTION

Tesoro is proposing to install new components and upgrade existing components at the refinery to produce cleaner burning gasoline and a new product, mixed xylenes. The majority of the proposed project additions and upgrades would occur within the already-developed areas of the refinery. There are five specific infrastructure additions and upgrades for the proposed project:

- Expand the Naphtha Hydrotreater (NHT) Unit to increase its processing capacity to further reduce the sulfur content in gasoline.
- Build a new Isomerization Unit to increase the amount of octane available to the refinery. Coupled with the NHT expansion, this provides more flexibility for gasoline production.
- Build a new Aromatics Recovery Unit (ARU) capable of producing 15,000 barrels per day (bpd) of mixed xylenes. Install a new steam boiler adjacent to the ARU to provide the additional process heat needed to operate the new ARU and steam to operate the expanded NHT.

- Build three new storage tanks on currently undeveloped land west of the refinery's existing tank storage area to hold reformate and mixed xylenes. Reformate is a high-octane liquid derived from refining crude oils and is commonly used in blending gasoline to get various octane ratings. In a process known as catalytic reforming, refiners distill partly refined crude oil and convert the distillate into reformate, a high-octane liquid (de Place and Stroming 2014; USEPA 1994). These additional tanks would expand the existing tank storage area and are referred to in this Final EIS as the New Tanks Area at the refinery.
- Build a new Marine Vapor Emissions Control (MVEC) System to capture vapors (so they are not emitted to the atmosphere) during product loading and unloading from marine vessels docked at the refinery wharf. The MVEC System consists of two physical components: the Dock Safety Unit located on the wharf and the Vapor Combustion Unit located onshore. While the MVEC System is being installed as part of this proposed project, it would also be used for other marine vessels, unrelated to xylenes transport, currently using the wharf.

The location of this new infrastructure is shown on Figure 1. A more detailed project description is in Draft EIS Chapter 2, Proposed Action and Alternatives.

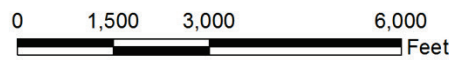
Two off-property areas would be changed due to the proposed project. The first consists of refinements to North Texas Road near the refinery's southern Gate 10 entrance that would widen the gate area and one area of the road. The second off-property change is the addition of five marine vessels per month calling at the refinery wharf for shipping the new product (mixed xylenes) and receiving additional reformate for use in xylenes production.



Legend

- Proposed Project Areas
- Tesoro Refinery Boundary

- Proposed 3-Inch Natural Gas Line



Source: ESRI Imagery Web Mapping Service NAD 1983 UTM Zone 10N

Figure 1: New Project Components

1.1.1. Construction Activities

The new proposed project infrastructure and upgrades are expected to be completed between 2017 and 2018. Construction would involve the following activities:

- Infrastructure placement and construction activities within the refinery footprint. This would include the NHT expansion, a new Isomerization Unit, which transforms hydrocarbons into higher-octane gasoline components for blending, a new ARU, a new steam boiler, new storage tanks, and new tie-ins to existing utilities and stormwater treatment systems.
- Installation of a Dock Safety Unit on the refinery wharf and a Vapor Combustion Unit within the existing refinery processing areas as part of the MVEC System.
- Installation of a 3-inch natural gas line from an existing natural gas line within the refinery to the end of Tesoro's causeway and wharf.
- Widening of the Gate 10 Access entrance to the refinery on North Texas Road and widening approximately 200 feet of the road to accommodate the heavy lift transport vehicles that would deliver the new process units.
- Increased vehicle traffic due to the presence of additional workers, delivery of site materials (10 to 50 truck trips per day), delivery of process units from the Port of Anacortes (52 deliveries), and import of fill material required for the New Tanks Area (70 trucks per day for 4 months).
- The addition of an average of 190 temporary construction workers for up to 19 months, with a peak number of approximately 270 temporary construction workers for up to 4 months.

1.1.2. Operations and Maintenance Phase Activities

Proposed project operations and maintenance activities that represent a change in existing refinery operations include the following activities:

- The addition of 20 permanent staff members to support the new activities. Use and/or storage of additional materials in new tanks on-site, including mixed xylenes, sulfolane (a solvent used to extract xylenes from petroleum feedstock), ammonia (required for the pollution control system on the new boiler), and reformat. Reformat is currently used at the refinery; however, the proposed project would require additional reformat storage capacity due to the increased volume of reformat use.
- Increased use of natural gas to operate new equipment.
- Increased vehicle traffic due to the additional workers as well as an increase in 50 truck trips per year to deliver chemicals (sulfolane, ammonia, and perchloroethylene) and other necessary supplies to the refinery. Perchloroethylene is currently in use at the refinery; however, the proposed project would require additional amounts.

- Increased marine vessel traffic to deliver additional reformat to the refinery and export xylenes from the refinery (60 additional vessels per year; approximately 5 per month). Twenty of the vessels would be used for exporting mixed xylenes; 40 vessels would be used to deliver additional reformat to the refinery. Reformat would be obtained from a variety of existing west coast sources; individual locations would vary depending on market conditions. The marine vessel transportation route from the refinery to the Pacific Ocean is shown on Figure 2.

Operation of the proposed project would not change the crude oil processing capacity of the refinery, the capability of the refinery to receive crude oil, or the method and number of crude oil deliveries.

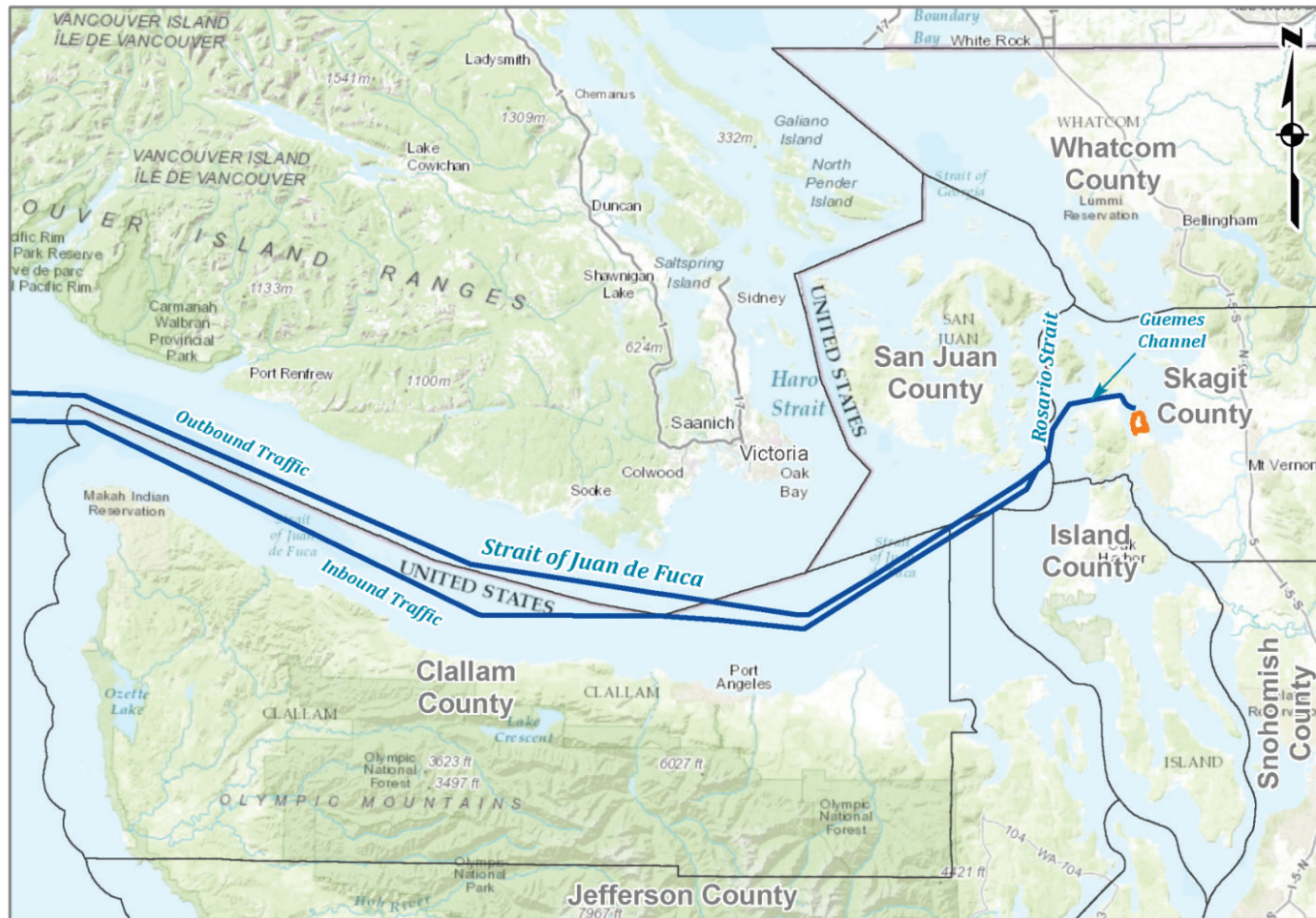
1.2. NO ACTION ALTERNATIVE

As required by SEPA, the Draft EIS evaluated a no action alternative. Under the no action alternative, Tesoro would not proceed with the proposed project. The refinery would be unable to meet the upcoming federal Tier 3 standards for reduced-sulfur gasoline in sufficient quantity to remain economically competitive and would not produce a new product, mixed xylenes. In the short term, the refinery would continue to operate as it does today, likely in a reduced capacity. Additionally, the contribution of the proposed project in reducing sulfur emissions would not occur. The Tier 3 standards implementation is expected to result in major health improvements in the U.S. on a nationwide basis. By 2030, the Tier 3 standards implementation is predicted to prevent up to 2,000 premature deaths, avoid up to 2,200 hospital admissions, and eliminate 19,000 asthma attacks each year (Union of Concerned Scientists 2016).

1.3. CONTENTS OF FINAL EIS

This Final EIS includes a summary of the public comments received on the Draft EIS with responses, makes factual corrections to the Draft EIS, and provides additional analyses and information in response to public comments. Chapter 2 of this Final EIS describes the process utilized to organize, categorize, consider, and address the comments received during the comment period for the Draft EIS. Chapter 3 contains updated information and analyses. Chapter 4 presents the recommended mitigation measures for the proposed project. Chapter 5 describes the distribution and notification of availability of the Final EIS. Chapter 6 provides references to literature cited in the Final EIS. The appendices include the Draft EIS comments and responses, errata to the Draft EIS, and additional information provided by Tesoro that was requested by Skagit County to better address comments on the Draft EIS.

Based on the comments received and the additional analyses that have been conducted and documented in this Final EIS, there are no changes to the conclusions presented in the Draft EIS, and no new significant impacts have been identified.



Legend

- Marine Vessel Transportation Route
- ▣ Tesoro Refinery Boundary



Figure 2: Marine Vessel Transportation Route from the Refinery to the Pacific Ocean

2. COMMENTS AND RESPONSES

Stakeholders and citizens had the opportunity to review and provide input on the Draft EIS during a 45-day comment period, from March 23 to May 8, 2017. This chapter describes efforts to engage the public following publication of the Draft EIS and describes how comments were processed and considered during the preparation of this Final EIS. A response has been provided in this Final EIS for each substantive comment received during the Draft EIS comment period.

2.1. NOTIFICATION OF DRAFT EIS AVAILABILITY

Skagit County issued the Draft EIS on March 23, 2017. The Draft EIS was made available on the project website, at reading rooms throughout the region (primarily libraries), and at the public hearing held on April 17, 2017.

Skagit County notified key stakeholders, interested parties, agencies, and the general public of the Draft EIS comment period using a variety of communication tools. The following tools were used to announce the release of the Draft EIS and comment period:

- Email sent to 3,078 addresses
- Print and online ads placed in local papers (over 75,000 impressions)
- Notice posted on the Skagit County website
- Notice posted on the project website
- Printed mailer sent to approximately 2,200 addresses

2.2. OPPORTUNITIES TO PROVIDE COMMENTS ON THE DRAFT EIS

Skagit County invited comments through a variety of methods. Table 1 provides a count of the number of comments submitted during the Draft EIS comment period using each method.

Table 1: Number of Comments Received on Draft EIS by Method of Submission

Method of Submission	Number of Comments Submitted
Online open house comment form	57
Project website form	336
Verbal public comment session	66
Voicemail	20
Email	6,773
Written (letters and print comment forms)	492
TOTAL	7,744

2.2.1. Project Website and Online Open House

Skagit County hosted a website that provided an opportunity for people to learn more about the proposed project and submit Draft EIS comments online. The site was live throughout the Draft EIS comment period (March 23 to May 8, 2017) and beyond. The website received more than 2,654 visits from 1,544 users during the Draft EIS comment period.

Skagit County hosted an online open house that provided an opportunity for people to learn more about the proposed project, take notes on the same content that was on display at the in-person public hearing, and then submit their Draft EIS comments online. The site included links to fact sheets summarizing the findings of the Draft EIS chapters. These fact sheets were made available online in both English and Spanish. The online open house received more than 1,043 visits from 275 users during the Draft EIS comment period.

The Google Translate function was embedded in the website and online open house, allowing visitors to translate each web page to one of 90 languages. Information was also provided about Americans with Disabilities Act or visually impaired accommodations at the bottom of each web page. The website and online open house provided an option on each web page to sign up for project SEPA process updates from Skagit County.

2.2.2. Open House and Public Hearing

Skagit County hosted an open house on April 17, 2017, from 4:00 pm – 8:00 pm, at Anacortes High School. The open house included information about the proposed project; in addition, a public hearing held during the open house gave attendees an opportunity to provide verbal comments. One hundred and fifty people signed in at the open house meeting. It is noted that several attendees declined the opportunity to sign in.

The Draft EIS open house featured eight stations (matching the online open house) with printed information related to the SEPA process and proposed project. The printed information included fact sheets summarizing the findings of the Draft EIS in both English and Spanish. Skagit County and consultant staff were present at each station to answer questions and to encourage people to submit comments. Laptops were available at a comment station, allowing attendees to visit the project website, participate in the online open house, and submit comments online. Comment forms were also available for people to leave written comments. A meeting guide was provided at the sign-in table that included a description of the types of information available at the open house, an event map, details about the verbal public comment session, instructions for how to provide a written comment, and other options available to provide Draft EIS comments after the public hearing.

The public hearing was facilitated from 4:30 pm – 8:00 pm in a room separate from the concurrent open house. Sixty-six people provided verbal comments. A lottery system was used to select speakers. Each speaker was given up to 2 minutes to provide comments, which were documented by a court reporter for consideration, analysis, and response. Since time allowed, speakers were given the option to comment up to three times.

2.2.3. Other Methods for Providing Comments

In addition to the project website and open houses, Skagit County also accepted comments through the following methods:

- Voicemail. Voicemails were limited to 5 minutes and were transcribed for consideration, analysis, and response. A total of 20 voicemails were received.
- Email. Skagit County provided a dedicated email address for comments. In addition, Draft EIS comments received directly by Skagit County staff were reviewed and forwarded to this address for analysis and response. More than 6,700 comments were received by email.
- Written comments. Written comments were accepted at the open house, public hearing, a post office box set up for this SEPA process, or by hand delivery to Skagit County Planning and Development Services. A total of 492 written comments were received.

2.3. COMMENT ANALYSIS PROCESS

During the public comment period, a total of 7,744 Draft EIS comments were received through the various methods described in the previous section. All communications (e.g., a single email) were reviewed and analyzed to identify substantive comments on the Draft EIS.

The full text of all communications was reviewed and entered into a database for analysis. Analysts recorded the name and contact information of each commenter, the source of the communication, and other relevant details specific to each communication. Once all communications were entered into the database, analysts read each communication to identify and categorize comments. Many communications contained comments in multiple categories. Each comment was then assigned to a topic category for response.

Each unique communication was reviewed at least twice: once by the primary analyst, and then again by a second analyst for quality assurance and control. This process allowed for discrepancies or inconsistencies to be resolved.

2.4. COMMENTS AND RESPONSES

Each unique substantive comment received a response, which are provided in Appendix A, Draft EIS Comments and Responses. The tables in Appendix A contain the following information:

- The Commenter Index Table lists the commenters alphabetically by last name and provides the comment identification code(s) associated with the communication:
 - The identification code for comments specific to a chapter of the Draft EIS begins with “Ch”.
 - The identification code for comments that do not correspond to a Draft EIS chapter begins with “Other”.

- The Chapter Tables contain the comments and responses corresponding to a particular chapter in the Draft EIS.
- Comments not pertaining to a particular chapter are provided in the Other Comments Table.
- Some communications contained text that was repeated by multiple commenters (e.g., form letters). Analysts identified 14 of these form letters. Each form is responded to once in the Form Submissions Table. If a commenter added a substantive comment to one of the form submissions, the addition was categorized in one of the other comment response tables based on its topic.

3. UPDATED INFORMATION AND ANALYSES

This chapter makes factual corrections to the Draft EIS and provides updated information and analyses prepared in response to comments received on the Draft EIS and presented in Appendix A, Draft EIS Comments and Responses, of this Final EIS. Corrections to typographical errors in the Draft EIS are provided in Appendix B, Errata, of this Final EIS.

In some cases, comments received on the Draft EIS required additional research, information from Tesoro, or analyses to prepare a response. In addition, analysts identified some information that needed to be updated since the Draft EIS was issued. The following sections of the Draft EIS have been updated with additional information or analyses in this Final EIS:

- Proposed Action and Regulatory Authority (all resources)
- Project Description (technology alternatives) (Draft EIS Section 2.9.1, Technology Alternatives Considered)
- Air Quality and Climate Change (Draft EIS Section 4.4, Potential Impacts on Air Quality and GHG)
- Terrestrial Vegetation and Wildlife (marine birds) (Draft EIS Table 6-6 and Draft EIS Section 6.5.2, Threatened and Endangered Species [State and Federal])
- Marine and Nearshore Resources (xylene toxicity to birds and aquatic species: Draft EIS Section 7.4.3.2, Marine Spills during Operations; impacts to Southern Resident killer whales: Draft EIS Sections 7.4.2, Impacts on Marine and Nearshore Resources from Marine Vessels and Operation, and 7.4.3, Impacts on Marine and Nearshore Resources from Marine Spills)
- Environmental Health (xylene exposures and cancer, short-term versus long-term exposures, refinery safety considerations: Draft EIS Section 9.6, Unplanned Events)
- Social and Economic Environment (emergency planning and response coordination with local services: Draft EIS Section 11.4, Public Services; costs and damages incurred during a spill and spill cleanup: Draft EIS Sections 11.5.2, Potential Impacts on Employment Income, and 11.6.2, Potential Impacts on Economic Resources: Tax Receipts)
- Cultural Resources (Draft EIS Sections 12.2.1, Study Area, and 12.3, Affected Environment)
- Marine Transportation (Draft EIS Sections 13.3, Vessel Traffic, 13.4, Vessel Safety, and 13.5, Marine Spills and Spill Response)

The sections below provide a summary of the comments on the resource area, followed by the additional analyses and/or corrections. Based on the analyses provided in this chapter, there are no changes to the conclusions presented in the Draft EIS, and no new significant impacts have been identified.

3.1. PROPOSED ACTION AND REGULATORY AUTHORITY

The Draft EIS described the location, project facilities, and construction and operations of the proposed action (see Draft EIS Chapter 2, Proposed Action and Alternatives).

Comments were received regarding the anticipated duration of project operations. The proposed project would be part of the larger operations of the Tesoro refinery. The proposed project is designed for a 20-year life. However, the facility could operate for a much longer period if components are replaced when needed. Maintenance activities during operation may include daily checks of tanks, pumps, piping, and instruments. The tanks and other new infrastructure would undergo routine inspections by experienced personnel. Permit requirements that apply to project operation would remain in place for the life of the proposed project.

Many comments were received regarding various regulations and requirements that could be applicable to the proposed project. Skagit County's role as the lead agency is to prepare this EIS to provide impartial discussion of environmental impacts and inform decision makers and the public. Skagit County is also responsible for issuing some of the permits required to implement the proposed project. As described in the Draft EIS, other federal, state, and local regulatory authorities are responsible for regulating or approving various aspects of the proposed project. Table 2 provides a summary of these government agencies with responsibilities related to the proposed project.

Table 2: Summary of Responsible Agencies by Topic

Topic/Agency	General Regulatory Responsibility	Regulatory Responsibility in Context of Proposed Project	Draft EIS Reference
Worker Health and Safety			
Washington State Department of Labor and Industries, Division of Occupational Safety and Health	Occupational health and safety	The Division of Occupational Safety and Health (DOSH) regulates worker safety and is responsible for ensuring Tesoro maintains worker health records, informs workers of the potential hazards of chemical exposure, and provides training and personal protective equipment to prevent exposure. DOSH routinely inspects the refinery to ensure compliance with health and safety regulations. A required process safety management program, following Washington Industrial Safety and Health Act regulations, is in place for safe and reliable operations at the refinery.	Table 9-1 Appendix 2-A Section 2
Skagit County Local Emergency Planning Committee; mandated by the Emergency Planning and Community Right-to-Know Act of 1986 (40 CFR 355) under U.S. Environmental Protection Agency’s jurisdiction.	Public reporting of storage and use of hazardous materials	The Washington State Department of Ecology (Ecology) ensures local jurisdictions (such as Skagit County) implement the Federal Emergency Planning and Right to Know regulations, which ensure communities have the information they need to plan for chemical emergencies. Such planning occurs through a Local Emergency Planning Committee (LEPC). The LEPC is a committee mandated by Title III of the federal Superfund Amendments and Reauthorization Act of 1986. Skagit County manages the local LEPC, which is comprised of representatives from industry, government, environmental groups and others. The LEPC receives information each year from businesses storing and/or using hazardous materials in excess of the thresholds established by the U.S. Environmental Protection Agency (USEPA) and this information is made available to support emergency management and response planning. Tesoro is a member of the Skagit County LEPC and provides the required hazardous materials information to the LEPC.	Table 9-1

Topic/Agency	General Regulatory Responsibility	Regulatory Responsibility in Context of Proposed Project	Draft EIS Reference
Marine Vessel Transit and Marine Spills			
U.S. Coast Guard	Certification of safety and spill response plans, procedures, and equipment for marine vessels that transport dangerous materials to protect U.S. waters	<p>The U.S. Coast Guard (USCG) is responsible for enforcing vessel safety requirements, including the safety requirements for the 60 vessels per year that would be calling at the refinery wharf due to the proposed project. The USCG also ensures that vessels carrying hazardous materials (like xylenes) have the proper certification to safely transport hazardous materials. Certification requirements are established by the International Convention of Safety of Life at Sea and the International Convention for the Prevention of Marine Pollution (MARPOL). Each individual tanker must have its own certificate, which specifies, among other requirements, the safety and spill mitigation equipment onboard the vessel. The USCG requires all arriving tankships to notify them 96 hours prior to arrival to provide time to verify vessel certificates.</p> <p>The USCG also approves facility oil spill response plans that might affect marine waters and serves as the Federal On Scene Coordinator for spill response activities in the coastal zone. USCG has certified the refinery’s oil spill contingency plan (OSCP). The OSCP needs to be resubmitted with changes due to the proposed project and needs to be recertified by the USCG and other agencies as noted in this table.</p> <p>The USCG would also ensure state and federal cleanup requirements are met, and all required regulations regarding cleanup are complied with.</p>	Table 13-1 Section 13.4 Additional Information: Final EIS Sections 3.7.2 and 3.9
U.S. Coast Guard Puget Sound Vessel Traffic Service	Maintaining safe conditions and traffic management for vessel transit and vessel anchorage in Puget Sound	<p>The USCG vessel traffic service maintains positive control of incoming and outgoing tankships and maintains navigational clearances to prevent collisions and provide safe passage. The USCG would control and regulate the vessel transits resulting from the proposed project. This includes enforcing safe distances from oncoming traffic, vessel speeds, other vessels, and navigational hazards. The USCG is also responsible for managing anchorage areas and regulating activities during anchorage to ensure compliance with safety regulations.</p> <p>In addition to having authority to enforce vessel safety, the USCG requires spill mitigation equipment and ensures spill cleanup is properly managed.</p>	Section 13.3.1.1
Canadian Coast Guard	Maintaining safe conditions and traffic management for vessel transit in Canadian waters to U.S. waters	The Canadian Coast Guard controls vessel traffic in Canadian waters and coordinates hand-off of vessel traffic to USCG in vessel transits from Canadian waters to U.S. waters. The Canadian Coast Guard has similar authority with regards to safety for Canadian waters as described above for the USCG.	Section 13.4.1.2

Topic/Agency	General Regulatory Responsibility	Regulatory Responsibility in Context of Proposed Project	Draft EIS Reference
Washington State Department of Ecology	Planning for emergency response and providing response support for marine vessel emergencies	<p>Ecology prepares Geographic Response Plans (GRPs), which are included in the spill response plan for the state of Washington. The GRP covering the proposed project is the Northwest Area Contingency Plan. Tesoro is required by Ecology to make sure refinery-specific plans and actions would be appropriately coordinated with the wider area plans. No changes to the wider area plans are anticipated to be required by Ecology based on the proposed project. The GRPs are used in advance of a potential spill to predetermine sensitive resources at risk of injury from oil spills, such as eelgrass, and to help direct response actions related to sensitive resource protection during the initial hours of a response.</p> <p>Ecology also approves facility oil spill response plans. Ecology has approved the refinery's OSCP. The OSCP needs to be resubmitted with changes due to the proposed project and needs to be recertified by Ecology and other agencies as noted in this table.</p> <p>Ecology is responsible for providing support to the USCG in the state of Washington for emergency response in marine waters that might be needed due to the proposed project's vessel traffic.</p>	Section 13.4 Section 13.5.7
Puget Sound Pilots Association, Board of Pilotage Commissioners	Safe operation of marine vessels in state waters	Proposed project vessels calling at the refinery (tankers and articulated tug barges) would be required to take on a pilot from the Puget Sound Pilots Association in accordance with The Washington State Pilotage Act (RCW 88.16170). The pilots are state licensed and familiar with local waters. The pilot station is at Ediz Hook in Port Angeles. For the vessels carrying xylenes, a tug escort is also required in addition to a special pilot.	Section 13.4.1.2
U.S. Coast Guard and State of Washington Board of Pilotage Commissioners	Tug escorts	During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as articulated tug barges) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180). In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190).	Table 13-1 and Section 13.3

Topic/Agency	General Regulatory Responsibility	Regulatory Responsibility in Context of Proposed Project	Draft EIS Reference
Geological Resources and Hazards			
Washington State Department of Natural Resources	Compliance with seismic-related construction and building codes	The Washington State Department of Natural Resources has the responsibility to enforce construction and building codes for components of the proposed project to comply with seismic requirements. The codes details seismic design requirements for buildings based on seismic ground motion.	Section 3.4
Skagit County	Compliance with International Building Code seismic design standards	Skagit County is responsible for enforcing the International Building Code during construction and assembly of the proposed project’s new infrastructure. The code details seismic design requirements for buildings based on seismic ground motion.	Table 3-1
Air Quality			
Northwest Clean Air Agency	Compliance with state and local air emission standards	<p>The Northwest Clean Air Agency (NWCAA) is responsible for enforcing state and local air quality limits through permitting (the Notice of Construction permit) and through post-construction air monitoring and inspections. The NWCAA would require Tesoro to install and operate pollution control devices for the proposed project. The NWCAA would determine the maximum air emissions that the proposed project could emit without exceeding air quality standards.</p> <p>NWCAA also is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. Part of this enforcement is addressed through requiring that storage tanks have appropriate controls on openings to minimize emissions.</p>	Section 4.1
Washington State Department of Ecology	Compliance with state air emission standards for new stationary sources	<p>Ecology enforces state air quality limits through permitting of the new stationary emission sources of the proposed project (the Prevention of Significant Deterioration permit). The permit would be required for the proposed project because the refinery would emit particulate matter (PM_{2.5} and PM₁₀) above the “significant emission rates” established in the regulations.</p> <p>Ecology is responsible for monitoring greenhouse gas (GHG) emissions from facilities that emit over 25,000 metric tons per year or produce fuels that emit greater than 25,000 metric tons per year. Ecology has enacted the Clean Air Rule that assigns a GHG reduction pathway for all facilities that emit 70,000 metric tons per year or greater.</p>	Section 4.1

Topic/Agency	General Regulatory Responsibility	Regulatory Responsibility in Context of Proposed Project	Draft EIS Reference
Freshwater/Surface Water Resources			
U.S. Army Corps of Engineers	Regulation of activities within waters of the U.S., including wetlands	The U.S. Army Corps of Engineers (USACE) is responsible for regulating activities within waters of the U.S., including wetlands.	Table 5-1 Section 5.5.1 Section 7.1.2
Washington State Department of Ecology	Regulation of discharges to waters of the state	Ecology is responsible for enforcing pollution discharge limits for the proposed project. Discharges from the refinery to waters of the state, including the marine estuary, are managed in accordance with the refinery’s National Pollutant Discharge Elimination System (NPDES) Industrial Wastewater Discharge Permit (Permit No. WA0000761) administered by Ecology. The existing NPDES permit would be modified to accommodate the new discharge sources for the proposed project and engineering controls for sulfolene. Ecology requires water samples of the refineries’ discharges be analyzed regularly for compliance with water quality NPDES permit requirements.	Table 3-1 Table 5-1 Table 7-1
Marine and Nearshore Resources			
National Marine Fisheries Service, an agency within the National Oceanic and Atmospheric Administration	Conserves, manages, and protects marine resources, including protection of marine species listed under the Magnuson-Stevens Fishery Conservation and Management Act, the Endangered Species Act, and the Marine Mammal Protection Act	The National Marine Fisheries Service (NMFS) is responsible for the management, conservation, and protection of the nation’s marine resources. The agency regulates commercial and recreational ocean fishing and manages marine life and habitats in waters 3 to 200 nautical miles from a U.S. shore. As part of its mandate, NMFS is responsible for protecting marine species listed as threatened or endangered under the Endangered Species Act and shares responsibility with the U.S. Fish and Wildlife Service (USFWS) for protecting marine mammals, including orcas, within U.S. waters. NMFS is responsible for ensuring that marine mammals or other special status marine species are not harassed or harmed.	Table 7-1
U.S. Fish and Wildlife Service	Protection of species listed under the Endangered Species Act	The USFWS shares protective responsibilities with NMFS for harassment of marine mammals within U.S. waters, including orcas, as well as for terrestrial and freshwater special status species protected under the Endangered Species Act.	Table 7-1
U.S. Army Corps of Engineers	Regulation of activities within waters of the U.S.	As part of their permit review process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species, their designated critical habitat, and marine mammals. The USACE also has jurisdiction over construction activities on the refinery’s wharf system (Dock Safety Unit and natural gas line) and operation of the spud barge adjacent to the wharf and causeway.	Table 7-1

Topic/Agency	General Regulatory Responsibility	Regulatory Responsibility in Context of Proposed Project	Draft EIS Reference
Washington State Department of Ecology	Manages the statewide framework for managing, accessing, and protecting shorelines of the state	Ecology is responsible for ensuring compliance with the Shoreline Management Act. The shoreline permit for the proposed project, which would be issued by Skagit County, would be reviewed by Ecology for consistency with the Shoreline Management Act.	Table 7-1
Washington State Department of Fish and Wildlife	Protection of state listed marine life	The Washington State Department of Fish and Wildlife (WDFW) is responsible for protecting state-listed marine life. WDFW protects marine life for the proposed project via issuance of hydraulic project approvals for the proposed projects' wharf construction activities – specifically installation of the gas line on the refinery wharf.	Table 7-1
Skagit County	Protection of shorelines of the state	Wharf construction activities would also require a shoreline permit from Skagit County. The County's permit would specify the requirements for the proposed projects' construction work on the refinery wharf to be consistent with the Skagit County Shoreline Management Master Program and the Shoreline Management Act.	Table 7-1
Spill Prevention (On-land and Marine)			
Washington State Department of Ecology	Review, approval, training, and certification for spill prevention plans and programs	Ecology requires the refinery to prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan and an Oil Spill Prevention Plan. The plans are regularly reviewed and certified as acceptable by Ecology and other agencies (USEPA and the USCG). Ecology is responsible for determining that Tesoro's plans are adequate and meet all regulatory requirements. These plans provide the detail on how the refinery prevents and responds to spills (land or water). Ecology would notify Tesoro if the plans require updating for the proposed project. Ecology also routinely inspects the refinery for compliance with Tesoro's approved prevention plans,	Section 2.7.6 Section 2.8.5 Appendix 2-A
U.S. Environmental Protection Agency	Oversight of spill prevention, control, and countermeasures planning	USEPA certifies the refinery's spill prevention and response plans described above, including the requirement that a SPCC plan be prepared and certified by a professional engineer. USEPA supplies an approval letter as part of their certification of the plan, and has supplied such approval on the latest version of the refinery's plan. In addition, the OSCP would need to be resubmitted with changes due to the proposed project and would need to be recertified by the USEPA and other agencies as noted in this table.	Section 2.7.6 Section 2.8.5
Washington State Department of Ecology	Protection of surface waters through stormwater and erosion management during construction	Ecology requires construction site operators to be covered by a Construction Stormwater General Permit. This requires that a Stormwater Pollution Prevention Plan and sediment, erosion, and pollution prevention control measures be developed for the proposed project.	Table 5-1 Appendix 2-A Appendix 2-B

Topic/Agency	General Regulatory Responsibility	Regulatory Responsibility in Context of Proposed Project	Draft EIS Reference
U.S. Department of Transportation	Regulates the land transport of hazardous materials	The U.S. Department of Transportation establishes requirements for the packaging, labeling, and transportation of hazardous materials following federal safety requirements. The trucks bringing in commodity chemicals for the proposed project will be required to meet these requirements.	Section 9.6
Washington State Department of Transportation	Regulates land transport of hazardous materials	The Washington State Department of Transportation ensures compliance with the U.S. Department of Transportation in the state and maintains a hazardous response team that would respond to traffic accidents of hazardous materials.	Section 9.6

PM_{2.5} = particulate matter less than 2.5 microns in diameter; PM₁₀ = particulate matter less than 10 microns in diameter; RCW = Revised Code of Washington;

3.2. TECHNOLOGY ALTERNATIVES

Tesoro considered a number of potential alternatives for the design of the proposed project, siting of proposed project components, and transport of products to and from the refinery. In some cases there were no alternatives identified. In other cases, the alternatives were eliminated from further analysis because they did not meet the objectives of the proposed project and/or one of the two alternatives criteria. A discussion of alternatives considered by Tesoro is included in Draft EIS Section 2.9, Alternatives Considered.

Several commenters suggested specifically that cogeneration or combined heat and power (CHP) should have been selected as Best Available Control Technology (BACT) instead of a steam boiler for the proposed project. CHP is an approach to generating electric power and useful thermal energy from a single fuel source. Instead of purchasing electricity from the distribution grid and separately burning fuel in an on-site furnace or boiler to produce thermal energy, an industrial or commercial facility can use combined heat and power to provide both services in one, energy-efficient step (U.S. Department of Energy 2016).

The steam boiler identified for the proposed project is a heat recovery boiler that produces steam at the desired pressure for the process usage. Refinery process equipment must be operated at elevated pressures and temperatures to achieve the desired chemical reactions. Each individual process has its own temperature and pressure requirements.

The use of a CHP to produce additional power would decrease the steam pressure and require additional energy input or compression to raise the steam pressure back up to the level required by the refinery processes. Waste heat from the steam boiler would be directed to the heat recovery section of the boiler and used elsewhere within the refinery processes to potentially reduce combustion in other process heaters.

Further, a CHP system was not considered a viable alternative because it would require more energy to operate than a steam boiler and the refinery is already considered to be efficient from an energy balance standpoint. The refinery is in compliance with the Oil Refinery GHG Reasonably Available Control Technology Rule. To achieve compliance, Tesoro had to demonstrate that the refinery is ranked in the top 50 percentile of refineries with regards to energy efficiency due to their high reuse of waste heat.

Cogeneration is typically used at refineries where excess fuel gas is readily available. The Tesoro Anacortes Refinery does not have excess fuel gas available to use for cogeneration purposes. Currently, Tesoro purchases natural gas to supplement its fuel gas. Therefore, a cogeneration system is not a feasible alternative.

One commenter noted that storage tank design standards need to meet Ecology requirements for oils since Draft EIS Chapter 2, Proposed Action and Alternatives, indicates the new tanks may be used to store gasoline or gasoline blend stock. The storage tank design would meet Washington Administrative Code (WAC) 173-180-330 in addition to the other requirements noted in the Draft EIS. The storage tank design regulation provides the requirements for the

construction, secondary containment, and maintenance and inspection program. Storage tank air controls are also included in the Northwest Clean Air Agency (NWCAA) air permit.

3.3. AIR QUALITY AND CLIMATE CHANGE

The air quality and climate change analysis in the Draft EIS evaluated the potential impacts of the air emissions from the proposed project. The air quality impact analysis focused on two categories of pollutants: the criteria air pollutants and the toxic air pollutants potentially emitted by the proposed project. The climate change impact analysis focused on greenhouse gases (GHGs). GHGs are air pollutants that trap heat within the earth's atmosphere and contribute to climate change. Additional information on air quality analyses and cumulative impacts are provided in the Draft EIS Chapter 4, Air Quality and Climate Change.

In response to comments on the Draft EIS, this section provides additional analysis on the ambient impact analysis for sulfur dioxide (SO₂), ozone, GHG impacts and mitigation, ocean acidification, and potential air emissions impacts from spills. Specifically, this section discusses vessel unloading-related SO₂ emissions in combination with the proposed project operation's SO₂ emissions; and the refinery's GHG contributions. This section also provides additional detail on how the proposed project's carbon dioxide (CO₂) and SO₂ emissions may affect ocean acidification and analyzes the contribution of GHGs to the atmosphere in the event of a large-volume marine spill (worst-case or maximum most probable spill scenario in the Draft EIS).

Comments on the Draft EIS related to these topics include the following:

- SO₂ emissions from vessel unloading activities should be included in the proposed project emissions for impact significance determination.
- Meteorological data and monitoring station data selected for use in modeling did not reflect available Swinomish Indian Tribal Community data to determine potential total concentrations that affect tribal land in the ambient air quality analysis (see Section 3.8.1.1, Modeling Meteorological Data Selection and Tribal Land Impact).
- GHG emissions from vessel traffic beyond the international boundary should be included in GHG emissions.
- GHG emissions from conversion of xylene to plastics could be more than direct fuel combustion of xylenes.
- GHG emissions reductions from redirecting xylenes from fuels into chemical feedstocks need to be real, verifiable, additional, permanent, and enforceable.
- New GHG emissions from the proposed project should be mitigated. Other fuel suppliers could increase their supply to fill the market demand and no reduction in fuel GHG would be realized.
- Other projects in the state of Washington have mitigated GHG emissions under SEPA and included the mitigation requirement in state or local air permits.

- Increased ocean acidification due to CO₂ and SO₂ emissions from this project.
- Emissions from spills should not be considered as GHG emissions.

3.3.1. Sulfur Dioxide Emissions during Vessel Unloading

Sulfur dioxide emissions from the marine vessels during unloading were evaluated in the Draft EIS as part of the analysis of emissions due to increases in vessel traffic (see Draft EIS Table 4-12). The unloading emissions are assessed in addition to the proposed project SO₂ emissions, which were evaluated in a separate section of the Draft EIS (see Draft EIS Table 4-7). The Draft EIS considered impacts associated with all the proposed project sources of SO₂. Commenters noted that the emissions associated with vessel unloading were not included in the modeling Tesoro conducted to support their NWCAA air permit application. Since secondary emissions do not include any emissions that come directly from a mobile source, such as emissions from a motor vehicle, train, or vessel, these emissions were not required to be included in the Prevention of Significant Deterioration Air Permit application and were not modeled with the new and modified refinery sources.

The combined sources from the March Point region contributed approximately 839 tons per year of SO₂ in 2011. The background hourly concentration at the Anacortes monitor (Site ID 53-057-0011) for the last 3 years of complete data (2013-2015) has averaged 14.1 micrograms per cubic meter (99th percentile value). The addition of another 39.6 tons per year SO₂ from the facility and 0.89 tons per year SO₂ from vessel unloading, would not result in a concentration that exceeds Ambient Air Quality Standards (AAQS). Therefore, SO₂ emissions would not result in a significant impact and there are no changes to the conclusions in the Draft EIS relevant to SO₂ emissions.

3.3.2. Spill GHG Emission Corrections

In the Draft EIS discussion of spill emissions (see Draft EIS Section 4.4.4.2, Impacts on Air Quality from Marine Spills from Vessels during Operations), GHG emissions were estimated from a worst-case spill event. The immediate emissions from spills would be either xylene or reformat products, depending on what material is spilled. These compounds are not listed GHG emissions so there would be no immediate release of GHG emissions. However, GHG compounds could evolve from the interaction of ultraviolet energy and xylene or reformat compounds over time and the Draft EIS was conservative and estimated that complete conversion would occur.

This impact would not be similar to a forest fire as previously described in Draft EIS Section 4.4.4.2, Impacts on Air Quality from Marine Spills from Vessels During Operations, because it would take longer for xylene or reformat compounds to eventually convert to GHG compounds when compared to GHGs generated during a forest fire. Therefore, the conclusions of the Draft EIS are more likely to overestimate the potential impact of a spill on air quality. The conclusion that a worst-case scenario spill could be potentially significant due to air toxic compounds is unchanged, but GHG emissions from spills of any size would not result in a significant impact.

3.3.3. GHG Emissions from Transportation and Conversion of Xylene

Many comments were received regarding the extent of analysis of GHG emissions in the Draft EIS. The proposed project would result in the Tesoro refinery extracting xylenes that already exist in reformato to make mixed xylenes (a petrochemical feedstock) for an international market instead of making liquid transportation fuels (gasoline) for the U.S. West Coast market. In total, the project would redirect reformato to make 15,000 bpd of mixed xylene products. Approximately 5,200 bpd of the 15,000 bpd total would be redirected from the Washington/Oregon gasoline market, with the remainder being redirected from the California market (see Draft EIS Section 4.4.6, Impacts on Air Quality and GHG from Fuels Conversion to Xylenes). This redirection from the gasoline market to instead produce mixed xylenes is unlikely to have a substantial impact on either of those markets. The global mixed xylenes market is between 1 and 1.5 million barrels per day (ICIS 2016, ICIS 2017). The West Coast gasoline market is approximately 1.5 million barrels per day. A single project redirecting 15,000 bpd between these two markets is unlikely to impact prices enough to alter demand and consumption. Nonetheless, if the proposed project is approved, then the Tesoro refinery would have a modified role in those two markets (i.e., it would replace some of its transportation fuels production with petrochemical production), resulting in a different overall downstream emissions profile for products produced at the refinery.

This different emissions profile comes from a combination of factors. First, the mixed xylenes have higher emissions associated with their transportation to market in Asia than if they were delivered to the local gasoline market. Second, these transport emissions would be lower than transport emissions for existing sources of mixed xylene imports to the Asian market (primarily the U.S. Gulf Coast). Currently, the U.S. is a net exporter of mixed xylenes, supplying approximately 18.5 billion barrels per day (approximately 25 percent of the Asian demand [Platts 2013]). To the extent the proposed project impacts the global market, it could displace 15,000 bpd of current xylene exports from the U.S. Gulf Coast (see Figure 3).

As depicted on Figure 3, shipping xylenes from Washington State to Asia is a shorter transport distance than from the Gulf Coast to Asia, resulting in lower GHG emissions because less vessel fuel is burned during transport. In addition, the emissions from transforming mixed xylenes into plastics products are lower than if mixed xylenes were burned as a component of liquid transport fuel. The emissions associated with converting 15,000 bpd of mixed xylenes to plastics are approximately 1.3 to 2.1 million metric tons per year, whereas the emissions from burning those mixed xylenes as a component of gasoline would be approximately 3 million metric tons per year.

Table 3 provides a comparison of the difference in annual emissions associated with redirecting 15,000 bpd of mixed xylenes from the domestic gasoline market to the Asian plastics market. The xylene combustion emissions represent a comparison of the two potential pathways for the mixed xylenes, but do not reflect state of Washington-specific transportation sector emissions.



Figure 3: Mixed Xylenes U.S. Shipping Routes Comparison

Table 3: GHG Emissions Comparison for Transportation and Conversion versus Combustion in Local Market

Starting Location and Product Type	Transportation (CO ₂ e metric tons per year) ^a	Conversion to Products (CO ₂ e metric tons per year) ^{b,c}	Total Emissions (CO ₂ e metric tons per year)	Combustion of Xylenes as Fuels (CO ₂ e metric tons per year) ^d	Annual Decrease in Emissions Due to Converting Xylenes to Products (CO ₂ e metric tons per year)
Shipping from Washington and transforming xylenes to polyester	290,860	1,291,916	1,582,776	2,963,844	(1,381,068)
Shipping from Texas and transforming xylenes to polyester	546,816	1,291,916	1,838,732	2,963,844	(1,125,112)
Shipping from Washington and transforming xylenes to plastic ^e	290,860	2,147,229	2,438,089	2,963,844	(525,755)

Starting Location and Product Type	Transportation (CO ₂ e metric tons per year) ^a	Conversion to Products (CO ₂ e metric tons per year) ^{b,c}	Total Emissions (CO ₂ e metric tons per year)	Combustion of Xylenes as Fuels (CO ₂ e metric tons per year) ^d	Annual Decrease in Emissions Due to Converting Xylenes to Products (CO ₂ e metric tons per year)
Shipping from Texas and transforming xylenes to plastic ^e	546,816	2,147,229	2,694,045	2,963,844	(269,799)

Sources: USEPA 2015; IPCC 2016; Plastics Europe 2008; 40 CFR § 98, Table MM-1

CO₂e = carbon dioxide equivalent

^a Emission factors from USEPA Climate Leadership November 2015 Emission Factors - Table 9 Product Transport Waterborne Craft – kilogram per ton-mile

^b Emission factors from Intergovernmental Panel on Climate Change Emissions Factor Database CO₂ Emission Factor EF 214034 - For Ethylene Production - other feedstock; CH₄ EF 214035 - For Ethylene Production; no N₂O EF provided

^c Emission factors from Environmental Product Declaration of European Plastics Manufacturers - For PET Bottle Grade - 2008. Global Warming Potential factor listed in output parameters

^d Emission factors from USEPA Table MM-1 Part 98, Default factors for petroleum products and natural gas liquids CARBOB - CO₂ equivalents per barrel

^e Plastic type is polyethylene terephthalate, used to make plastic drinking bottles.

In general, using mixed xylenes in plastics production has lower end-use GHG emissions than burning it as gasoline. Shipping mixed xylenes to Asia from Washington has lower transport emissions than shipping them from the U.S. Gulf Coast. The combustion GHG emissions did not include shipping the fuel to terminals or gas stations, so it is a conservatively low number for the comparison. This comparison demonstrates that with respect to minimizing GHG emissions, transporting mixed xylenes from Washington for conversion to products is preferable to shipping mixed xylenes from the other U.S. markets. Even with the change in the GHG footprint of the product, the project would have a minor impact on either the larger fuels market or the larger mixed xylenes market.

3.3.4. Washington GHG Emissions Impact and Mitigation

Under the Washington Clean Air Rule (CAR) (WAC 173-442) and GHG Reporting rule (WAC 173-441), entities report separately their stationary emissions and the emissions associated with the petroleum products they produce or import. Tesoro would report (and be regulated) as both a stationary source and petroleum product producer. Therefore, both GHG emissions from the facility and their produced petroleum products will be included in Tesoro’s baseline GHG emissions. If operation of the proposed project results in Tesoro reporting less GHG emissions as a petroleum product producer due to increased exports, then that could result in Tesoro reporting a net reduction in GHG emissions. Tesoro could have a reduction in reported emissions even if overall state of Washington transportation sector emissions do not change. Tesoro may generate emissions reduction units (ERUs) that could later be used for CAR compliance. Ecology has commented that they will make a determination with respect to CAR compliance at a later date (Ecology 2017).

From a SEPA perspective, there are increases in direct and indirect GHG emissions due to the proposed project that were reported in Draft EIS Section 4.4.2.2, Impacts on GHG Emissions. Direct increases in GHG emissions from the proposed project would result from the operation of the new boiler, MVEC, and increased process heater usage. Indirect reductions of GHG emissions would result from a portion of fuel production being used to produce xylene for export instead of being combusted in the local fuels market. In contrast to how GHG emissions and reductions are accounted for under CAR (whereby Tesoro may be able to obtain ERUs from reported reductions in GHG emissions by exporting a higher percentage of their petroleum products), this change in production may not result in an overall net reduction of GHG emissions statewide. It is anticipated that the demand for transport fuel supply in the state of Washington would remain relatively similar. Consequently, there would still be similar GHG emissions from combustion of transport fuel supplied by other sources to meet demand state-wide. However, those sources are unrelated to the proposed project and these market fluctuations will be addressed by Ecology under the CAR. While Tesoro's proposed project may result in an increase in direct GHG emissions from the operation of proposed new combustion sources, under the CAR, Tesoro may be able to offset any potential impacts by obtaining ERUs for the reduction of GHG emissions associated with the facility's reduction in product supply. Therefore, the conclusions with respect to GHG emissions in the Draft EIS remain unchanged.

In response to comments on the Draft EIS, Tesoro voluntarily committed to making a monetary contribution to the NWCAA's grant program, which funds local environmental projects. The value of the monetary contribution will be negotiated between Tesoro, NWCAA, Ecology, and Skagit County.

3.3.5. Ocean Acidification Due To Effects of Increased SO₂ Emissions

Ocean acidification has been a global concern for some time, primarily due to global CO₂ emissions. Seawater chemistry could be affected by emissions of acid gases such as SO₂. Losses to fisheries and shellfish beds have resulted from the acidification of ocean waters (Washington State Blue Ribbon Panel on Ocean Acidification 2012). In 2007, USEPA started the reduction of sulfur in marine fuel by lowering the fuel standard to a maximum of 500 parts per million (ppm) sulfur by weight. In 2014, the USEPA enacted the final level of marine fuel sulfur standard at a maximum of 15 ppm sulfur by weight for fuel producers. With the recent requirements for low-sulfur marine fuels from the International Marine Organization, ocean transport fuel sulfur standards have gone from 15,000 ppm sulfur to 1,000 ppm sulfur in Emission Control Areas, which includes the U.S. The global open-ocean transport reductions are not fully in effect until 2020, but the ocean transport sulfur content has been reduced from 35,000 ppm sulfur to 5,000 ppm sulfur.

Typically, vessels used within U.S. Emission Control Areas have used marine fuels that meet the USEPA marine fuel standard. SO₂ emissions from marine vessels have been significantly reduced over the past few years. The vessels entering and operating within Puget Sound have reduced SO₂ emissions 14 percent between 2005 and 2011 due to the marine fuel sulfur standard reductions (13,600 tons per year in 2005 to 11,700 tons per year in 2011 [Puget Sound Maritime Forum 2012].) The recent USEPA marine fuel standard reduces sulfur in marine fuel by

97 percent and the International Maritime Organization standard reduces sulfur by 90 percent, so additional reductions are expected.

The new SO₂ emissions from the vessel traffic associated with the proposed project (see Draft EIS Table 4-12) and the additional facility SO₂ emissions (see Draft EIS Table 4-7) would not contribute significantly to ocean acidification.

3.4. TERRESTRIAL PLANTS AND WILDLIFE – MARINE BIRDS

The terrestrial plants and wildlife analysis evaluated potential impacts from the proposed project on plants and animals that predominantly live on land, including shorebirds, marine birds, and other waterfowl that use both terrestrial and aquatic habitat (see Draft EIS Chapter 6, Terrestrial Vegetation and Wildlife).

Three bird species were identified in comments suggesting additional information should be provided in this Final EIS. These three additional species are addressed in this section:

- Additional analysis for the marbled murrelet (*Brachyramphus marmoratus*) to address the recent change in state listing status from threatened to endangered
- Addition of the sandhill crane (*Antigone canadensis*) to the Final EIS based on information received from commenters that indicates the species may occur in the vicinity of the proposed project
- Additional discussion on the potential for inhalation effects to herons at the March Point Heronry in the event of a mixed xylenes spill at the refinery wharf

3.4.1. Marbled Murrelet

The marbled murrelet (*Brachyramphus marmoratus*) periodic species status review was completed by the Washington Department of Fish and Wildlife in October 2016 (WDFW 2017). The department recommended that the species' status change from state-threatened to state-endangered. The Washington Fish and Wildlife Commission adopted the recommendation in January 2017; therefore the correct current listing for the marbled murrelet is state-endangered (WDFW 2017). Table 4 below presents updated information on the marbled murrelet including additional information regarding species occurrence in the proposed project vicinity.

Table 4: Revisions to Draft EIS Table 6-6

Common Name	Scientific Name	Federal Status	State Status	Source	Species Information	Occurrence
<i>Marine Birds</i>						
Marbled Murrelet	<i>Brachyramphus marmoratus</i>	Federal Threatened	State Endangered	IPaC	The marbled murrelet forages in the marine environment, usually within approximately 1 to 5 miles from shore (Desimone 2016). The diet predominantly consists of fish (Desimone 2016). The species breeds from April to mid-September up to 55 miles from the ocean (Desimone 2016). The species does not nest in colonies (Desimone 2016). In 2013, the U.S. population was estimated at approximately 20,000 individuals in the U.S., including 4,400 individuals in Puget Sound and Strait of Juan de Fuca. Annual aerial surveys from 1992 through 1999 (Nysewander et al. 2005) consistently observed one to two marbled murrelets in Fidalgo Bay. The IPaC database identified critical habitat for the species near the study area; however, the critical habitat is not located within the study area.	The species is known to occur within the study area, in Fidalgo Bay. Manns (2017) documents species presence along the marine vessel transportation route in Guemes Channel and San Juan Islands. Additionally, areas along the northern Olympic Peninsula serve as foraging habitat for marbled murrelet (Manns 2017). The study area does not contain suitable terrestrial nesting habitat for the species.
<i>Other Species</i>						
Sandhill Crane	<i>Antigone canadensis</i>	Migratory	State Endangered	Stinson 2017; Manns 2017	Sandhill cranes were listed in Washington as state-endangered in 1981 (Stinson 2017). Three subspecies of sandhill crane occur in Washington. The Canadian sandhill cranes (<i>A. c. rowani</i>) that migrate through western Washington breed in British Columbia and Alaska (Stinson 2017, Ivey et al. 2005). Sandhill cranes are opportunistic feeders and will consume prey such as roots, berries, invertebrates, lizards, and snakes (Stinson 2017). Sandhill cranes form life-long breeding pairs, begin breeding at age three, and nesting success improves with age (Stinson 2017).	Manns (2017) documented occurrence of sandhill crane during migration in the upland habitat near March Point Road in 2016.

Note: IpaC = Information for Planning and Consultation. Species identified through the U.S. Fish and Wildlife Service IPaC tool (USFWS 2017)

Commenters noted that the Washington State Department of Natural Resources (WDNR) has a long-term conservation strategy for the marbled murrelet (WDNR and USFWS 2016). The portions of the WDNR report relevant to the proposed project are those that relate to marine conditions. The WDNR report states that challenges facing marbled murrelets in their marine environments include finding food and avoiding predators. These challenges are often related to ocean conditions (e.g., pollution degrading prey availability and algal blooms). Anthropogenic risks that may also affect marbled murrelets at sea include direct mortality from pollution, oil spills, fishing gear, and marine vessel traffic (WDNR and USFWS 2016). Climate change is also attributed to driving marbled murrelet population dynamics and affecting the terrestrial and marine habitats of this species (Piatt et al. 2007; USFWS 2009). While marine habitat challenges have contributed to population declines in marbled murrelets, scientists are still working to document these occurrences (WDNR and USFWS 2016). Marine distribution of marbled murrelets during the breeding season is correlated with the proximity of inland nesting habitat (Piatt et al. 2007; Raphael et al. 2016; WDNR and USFWS 2016).

The Draft EIS concluded that if a large-volume marine spill (worst-case or maximum most probable spill scenario in the Draft EIS) were to occur, impacts to the marbled murrelet would be less than significant because: 1) the study area does not provide nesting habitat for the species, and 2) the products spilled (xylenes and reformate) do not bioaccumulate and would not affect prey abundance due to the rapid evaporation of these products from the environment. Therefore, there are no changes to the conclusions of the Draft EIS.

3.4.2. Sandhill Crane

Three subspecies of sandhill crane (*Antigone canadensis*) occur in Washington: Greater (*A. c. tabida*), Canadian (*A. c. rowani*), and Lesser (*A. c. canadensis*). Populations of sandhill cranes vary in breeding range and timing and routes of migration (Ivey et al. 2005; Johnson et al. 2005; Petrula and Rothe 2005; Stinson 2017). Pacific flyway Canadian sandhill cranes are state-listed endangered in Washington and the study area is within the species' distribution. Recent reports document sightings of sandhill cranes in the upland habitat at March Point near March Point Road during migration (Manns 2017).

Sandhill cranes would primarily be found occupying upland habitat during periods of migration and would not be found within marine waters. Given the low likelihood of a large-scale spill (worst-case or maximum most probable spill scenario in the Draft EIS) and that the species would not be found using the marine resources, the sandhill crane would not be subject to direct impacts during a spill event. Contaminants are considered unlikely to bioaccumulate and would not result in direct impacts on the species' foraging resources. Therefore, the impact of the proposed project on the sandhill crane would be ***less than significant***. The toxicity of xylene and reformate and potential impacts that apply to marine birds, including the sandhill crane, are further discussed in Section 3.5.2, Toxicity of Xylenes to Marine Birds and Aquatic Life.

3.4.3. March Point Heronry

Public comments were received regarding the potential for air emissions from a spill to reach the upland great blue heron colonies on March Point. As discussed in Draft EIS Chapter 6, Terrestrial Vegetation and Wildlife, the heronry is outside the proposed project study area and, as these birds nest in upland areas away from the shoreline and xylenes do not bioaccumulate in prey food. Air emissions from a spill of mixed xylenes at the refinery wharf could theoretically reach the heronry, which is southwest of the refinery. No studies on the inhalation of mixed xylenes in birds were identified in the literature (see Section 3.5.2, Toxicity of Xylenes to Marine Birds and Aquatic Life). As described in Draft EIS Appendix 13-A, Fate and Behavior Analysis in the Marine Environment: Reformate and Mixed Xylenes, mixed xylenes or reformate would degrade relatively rapidly, degrading in the atmosphere to harmless components within 14 to 26 hours. The degradation would be expected to be more rapid if there were winds. In the absence of winds, degradation may take relatively longer but the dispersal would be more limited. Under either scenario, accounting for the rate of natural degradation in the environment and the fact that these chemicals are heavier than air, a marine spill of either reformate or mixed xylenes at the most proximate location (the wharf) would not be expected to affect or result in exposure of herons at the March Point Heronry. Further, the activities associated with the spill response would be expected to discourage wildlife from using these areas, thus further reducing the potential for exposure of marine birds to the spilled material. Therefore, the impact of the proposed project on the March Point Heronry would be *less than significant*.

3.5. MARINE AND NEARSHORE RESOURCES

The marine and nearshore resources analysis evaluated potential impacts of the proposed project on resources that occur in saltwater systems that are not significantly diluted by freshwater runoff. The impact analysis for marine and nearshore resources included marine vegetation, marine plants, shellfish, fish, marine mammals, and their habitats (see Draft EIS Chapter 7, Marine and Nearshore Resources).

Comments on the Draft EIS discussed in this section relate to potential impacts to the Southern Resident killer whale (*Orcinus orca*) populations, the uncertainties surrounding estimating toxicity to birds and aquatic species in the marine environment, and the exclusion of the loggerhead sea turtle.

3.5.1. Southern Resident Killer Whales

Comments on the Draft EIS expressed that the potential significance of impacts on the Southern Resident killer whale populations are underestimated or overestimated (depending on the comment). Determination of potential impacts were based on an analysis of the potential impacts of the proposed project, the SEPA guidance for assessing potential impacts and the criteria established for this project (see Draft EIS Chapter 7, Marine and Nearshore Resources, and Draft EIS Appendix 1-B, Impact Criteria Tables) and measures that would be implemented as part of the proposed project to protect marine mammals.

The study area for Southern Resident killer whale and marine mammals was not expanded for analysis in this Final EIS beyond the area evaluated in the Draft EIS. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). The lack of information and uncertainty about the routes of vessels and destinations of the mixed xylenes would require significant assumptions resulting in a speculative analysis that would not result in useful information for agency officials.

Affected environment information for Southern Resident killer whales in the Draft EIS was primarily based on the Recovery Plan for Southern Resident Killer Whales (*Orcinus orca*) published by the National Marine Fisheries Service (NMFS) in 2008 (NMFS 2008). However, the Southern Resident killer whale was recently included in the Species in the Spotlight program initiated by the NMFS in 2016. The program identifies eight species that are considered among the most at risk of extinction and supports existing partnerships and fosters new collaboration (NMFS 2016).

Analysis of the potential impacts of the proposed project on Southern Resident killer whales in the Draft EIS was based on the most recent Technical Guidance for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA 2016). The Technical Guidance includes a summary of permanent threshold shift onset acoustic thresholds for five marine mammal hearing groups (low-frequency cetaceans, mid-frequency cetaceans, high-frequency cetaceans, Phocid Pinnipeds [underwater], and Otarrid Pinnipeds [underwater]). Southern Resident killer whales are grouped under mid-frequency cetaceans and the acoustic thresholds of mid-frequency cetaceans is 198 decibels cumulative sound exposure level for non-impulsive sources such as large marine vessels. However, this threshold applies to marine mammal hearing sensitivity (injury thresholds) and does not apply to behavioral responses that affect feeding and social interactions.

Additional information from the NMFS used for the impact analysis identifies the potential for large vessels to affect Southern Resident killer whales at long distances. However, noise from small, fast-moving vessels in close proximity to the whales and targeting the whale's movements was identified as the primary concern for the species (NMFS 2010). In general, large vessels, such as tankers, cargo ships, and ferries use predictable straight paths and are slow moving, which is recognized by the NMFS to reduce the risk of vessel strikes to whales (NMFS 2010). In addition, large vessels do not specifically target the whale's movements. Available data show that on average these types of vessels comprise 6 percent or less of the total vessels within 0.5 mile of Southern Resident killer whale.

A recent publication from the University of Washington (Wasser et al. 2017) conducted research on stress hormone levels and pregnancy rates in orca whales from 2008 to 2014 in the study area of the EIS. The study specifically focused on the Southern Resident killer whale population. Temporal patterns in the stress hormone profiles of the Southern Resident killer whales suggested seasonal timing and overall strength of Chinook salmon runs in the Columbia and Fraser Rivers were primary driving factors for observed periods of stress in the orca whale population. Nutritional stress was shown to be associated with a reduction of successful pregnancies for orca whales, which ultimately impairs the potential for recovery of the

endangered population. Data was also collected every half hour for the number and type of marine vessels within 0.5 mile of the Southern Resident killer whales for the duration of the study. The study found that stress hormone levels were correlated with the abundance and availability of Fraser River Chinook salmon instead of marine vessel traffic. Exposure to toxins and disturbance from marine vessel traffic were identified as having potential cumulative effects. However, the publication concluded that a reduction in the preferred prey (threatened and endangered Chinook salmon) appears to be the primary factor for the historic and ongoing decline of orca whales.

Noise from operation of marine vessels associated with the proposed project has the potential to disturb behavior of pinnipeds and whales within 5 miles of the marine vessels. However, due to the short duration of disturbance and the information provided above from the NMFS, marine vessel operation is unlikely to impact behavior of marine wildlife to an extent that would reduce the viability of a population of a marine wildlife species. As indicated in the Draft EIS, the increase of five marine vessels per month (60 vessels per year or 5 vessels per month) is equivalent to a 0.1 to 2.2 percent increase in large marine vessel traffic along these transportation routes, which would not be considered a significant increase in marine vessel traffic over current levels. Therefore, the determination of less than significant impacts from the proposed project on Southern Resident killer whale is supported by the analysis completed in the Draft EIS.

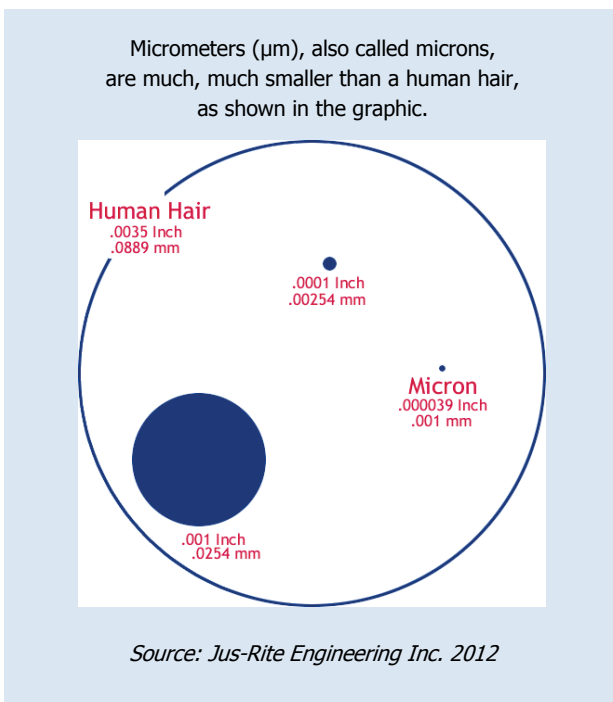
The Canadian National Energy Board report (NEB 2016) was accounted for in assessing potential impacts; however, it was not solely the basis for determining potential impacts from the proposed project. It is acknowledged that the volume of marine vessel traffic attributable to the Trans Mountain Expansion Project is much greater than the amount that the Draft EIS attributes to the proposed project. However, the proposed project vessel traffic would still overlap with the Trans Mountain vessels within the Salish Sea near the Strait of Juan de Fuca, which is encompassed by the Southern Resident killer whale critical habitat. Due to the status of the Southern Resident killer whale as a federally endangered species (and one of eight spotlight species), cumulative impacts to the species were considered potentially significant in the Draft EIS.

The primary concern for cumulative impacts to the Southern Resident killer whale, based on available information, is the sound from small, fast-moving vessels moving in close proximity to the whales and targeting the whales (NMFS 2010). While small, fast-moving vessels are not part of the proposed project, due to the status of the Southern Resident killer whale as a federally endangered species, and one of eight Spotlight species, there is a potential for cumulative impacts due to the proposed project. This additional analysis confirms the conclusions of the Draft EIS—increases in vessel traffic could contribute to cumulative impacts.

3.5.2. Toxicity of Xylenes to Marine Birds and Aquatic Life

The analysis of the impacts to marine birds and aquatic life in the event of a spill included in the Draft EIS was based on the following toxicity assumptions:

- Toxicity assumptions for marine birds, marine mammals, and sea turtles:
 - Xylenes and reformate present on the surface of the water at thickness levels greater than 0.1 micrometer (μm) before any toxic effects were considered likely.
 - Foraging of prey exposed to xylenes or reformate would not be an important source of exposure to birds as the products do not bioaccumulate and are rapidly metabolized.
- Toxicity assumptions for fish: dissolved water concentrations greater than acute water quality criteria.



Some comments were received that indicated the approach used to analyze impacts in the Draft EIS might overestimate toxicity, while other comments stated that toxicity could be underestimated. There are uncertainties in assessing toxicity because of the limited scientific studies that characterize the hazards of acute exposure to mixed xylenes and reformate in a dynamic marine environment where exposure could occur via inhalation, ingestion, contact with surface slicks, and dissolved concentrations in the water column. These uncertainties are discussed in more detail below.

No studies were identified that assessed the acute toxicity of inhalation or ingestion of xylene or reformate in birds. Therefore, it is uncertain if lethal or sub-lethal effects would occur in the first 36 hours following a spill when the chemicals could be present in a slick on the water surface at a thickness level greater than $0.1 \mu\text{m}$ and undergoing the volatilization process. During the volatilization process, chemicals with vapor pressures greater than atmospheric pressure will vaporize into the ambient air. For a spill, 99.5 percent of all products would be gone in 60 hours (less than 3 days); however most significant volatilization will have occurred during the first day of the spill. Due to the limited data, the impacts to marine birds in the event of a large-volume unplanned spill (worst-case or maximum most probable spill scenarios in the Draft EIS) were conservatively estimated to be **potentially significant** for those birds that are likely to be present in the study area (see Draft EIS Section 6.4.3.3, Spills to the Marine Environment during Operations).

As discussed in Draft EIS Sections 6.4.3.3, Spills to the Marine Environment during Operations, and 7.4.3.2, Marine Spills during Operations, a slick thickness of $0.1 \mu\text{m}$ (one order of magnitude less than the literature toxicity threshold of $1 \mu\text{m}$) was selected as the conservative threshold for potential impacts. The toxicity threshold of $1 \mu\text{m}$ slick thickness was the minimum cutoff used in the biological effects model used by the National Oceanic Atmospheric Administration (NOAA) in their assessments of black oil (French-McCay 2009; French-

McCay et al. 2002; French-McCay et al. 2004). The Draft EIS acknowledged that this slick threshold is a conservative estimate of toxicity for mixed xylenes and reformate since the NOAA model threshold is based on oil, which does have some volatile components but also has many other toxic components in the mixture that are not found in mixed xylenes and reformate. Additionally, many of the adverse effects from oil slicks are attributed to the persistent, highly toxic, high molecular weight compounds; none of these components are present in mixed xylenes and reformate, as noted in Draft EIS Chapter 13, Marine Transportation. Therefore, impacts to birds, marine mammals, and turtles based on the 0.1 μm threshold are very conservative estimates since 0.1 μm is a much lower threshold than literature-based effects and because those literature-based effects were attributed to a mixture of chemicals with higher toxicity and persistence than xylenes and reformate.

There are also uncertainties in the analysis on impacts to fish due to dissolved concentrations of xylene in the water column. Fish impact thresholds were conservatively estimated using the lethal concentration 50 (LC_{50}) of 2.6 milligrams per liter (mg/L) for the freshwater rainbow trout (*Salmo gairdneri*) from Galassi et al. (1988). This effect concentration is based on experiments with only one isomer of xylene, p-xylene. The other xylene isomers have been reported to have higher fish toxicity thresholds. Thus, mixed xylenes are likely to have an LC_{50} that is higher than 2.6 mg/L due to the varying composition of xylene isomers. Furthermore, the experiment conducted on rainbow trout that resulted in a 2.6 mg/L effect value was performed under closed conditions in a laboratory, which is different from the dynamic nature of actual offshore conditions. Another experiment that used moving water to estimate effects to rainbow trout found the fish to be affected at 17.3 mg/L xylenes (Walsh et al. 1977). Consequently, the varying test results and evidence of no fish mortality in the event of a spill suggests that a threshold of 2.6 mg/L is likely an overly conservative threshold for effects. The uncertainties surrounding estimating the concentration in the water column are discussed below in Section 3.9.2, Spill Modeling.

The Draft EIS took a conservative approach in estimating toxicity, as described above. Therefore, the conclusions of the Draft EIS are more likely to overestimate than underestimate the toxicity of a spill. However, the conclusions that a large-volume spill (worst-case or maximum most probable spill scenario in the Draft EIS) could be **potentially significant** for marine birds (non-lethal toxicity), and also **potentially significant** for special-status fish and marine mammals, are deemed appropriate given the uncertainties in the toxicity data and the unknowns in the location and volume of any spill event.

3.5.3. Loggerhead Sea Turtle

The leatherback sea turtle (*Dermochelys coriacea*) was the only sea turtle species included in the Draft EIS (see Draft EIS Section 7.3.3.9, Sea Turtles). Commenters reported that the loggerhead sea turtle (*Caretta caretta*) may also occur at the western limit of the study area. Consequently, the loggerhead sea turtle Northern Pacific Distinct Population Segment (DPS) is included in this Final EIS (see Table 5). The entire loggerhead sea turtle population was initially listed as threatened under the federal Endangered Species Act in 1978 and as threatened under state of Washington law in 1990 (WAC 232-12-011). In 2011, the Northern Pacific DPS was recognized

and listed as endangered under the Endangered Species Act (Sato 2016). The Northern Pacific DPS of loggerhead sea turtles have nesting sites in Japan and are found primarily in pelagic waters off the west coast of Mexico, Southern California, and Hawaii. They also make rare appearances on the outer coast of Washington (Witherington 2002; NMFS and USFWS 1998). Within these areas, loggerhead sea turtles are found in a range of habitats, including pelagic waters, bays, lagoons, estuaries, and in general are found foraging in coastal waters associated with continental shelves (Dodd 1988; Sato 2016; Plotkin 2003). Foraging behavior is omnivorous and includes all life stages of invertebrates and some jellyfish (NMFS and USFWS 1998).

Table 5: Revisions to Draft EIS Table 7-11

Species	Federal Listing		State Listing		Occurrence in Study Area
	Endangered Species Act	Critical Habitat within Study Area	Species of Concern	EFH within Study Area	
Loggerhead sea turtle <i>Caretta caretta</i>	Endangered	No	Threatened	NA	Species sightings are rare, but occur at the western limit of the study area; may be uncommon visitors to other parts of the study area.

EFH = essential fish habitat; NA = not applicable

The toxicity of xylene and reformate and potential impacts due to construction and operation of the proposed project with regard to sea turtles are discussed in Draft EIS Sections 7.4.1, Impacts on Marine and Nearshore Resources from Construction, and 7.4.2, Impacts on Marine and Nearshore Resources from Marine Vessels and Operation, respectively. Due to similar abundance in the study area and the life history characteristics of leatherback and loggerhead sea turtles, this analysis in the Draft EIS would also apply to loggerhead sea turtles. Therefore, based on the analysis of potential impacts to leatherback sea turtles in the Draft EIS, the impact of the proposed project on the loggerhead sea turtle would also be *less than significant*.

3.6. ENVIRONMENTAL HEALTH

The environmental health analysis evaluated the environmental conditions that could impact human health for workers at the refinery or people in communities near the proposed project. The environmental health impact analysis considered exposure to air emissions, increases in terrestrial vehicle traffic and noise, and spills (see Draft EIS Chapter 9, Environmental Health). Comments were received on the Draft EIS regarding the following issues:

- Cancer risk associated with xylenes
- Differences in short-term versus long-term air quality and human health effects
- Requests for additional information regarding the status of the Tesoro refinery’s progress in implementing U.S. Chemical Safety and Hazard Investigation Board (CSB) recommendations based on the investigation and findings of the 2010 explosion

These issues are discussed below.

3.6.1. Cancer and Xylenes

Several comments were received regarding the potential carcinogenic nature of xylenes. Neither USEPA nor the state of Washington regulates xylenes as a human carcinogen. All regulatory air quality standards for short-term and long-term exposure to xylenes are based on non-cancer health effects. The Draft EIS evaluated health risks based on these standards.

According to the USEPA, “data are inadequate for an assessment of the carcinogenic potential of xylenes” (USEPA 1999). Available studies on the ability of xylenes to cause carcinogenic responses in laboratory animals have been inconclusive, and evaluations of genotoxic¹ effects of xylenes have consistently given negative results (USEPA 1999; USEPA 2002). However, despite the regulatory agencies’ current determination, some chemical manufacturers have listed xylenes as “possibly carcinogenic to humans” on their material safety data sheets (CITGO 2015). This designation is based on limited evidence of xylenes’ carcinogenic effects in laboratory animals.

While no studies currently demonstrate a causal link between xylenes and cancer for humans, there is some scientific literature indicating further study may be warranted. A group of researchers from the Oak Ridge National Laboratory (ORNL) reviewed publicly available datasets and identified a potential relationship between patients with lung cancer and xylene exposure (ORNL 2015). The ORNL researchers concluded that the data do not confirm that xylene causes cancer; however the data do support the need for a “carefully designed longitudinal cohort study” (ORNL 2015).

The impacts to human health in the event of a worst-case or maximum most probable spill scenario were identified as *potentially significant* based on potential health effects from short-term exposures and the potential for acceptable source impact levels (ASILs) to be exceeded for up to 24 hours after a large-volume spill (see Draft EIS Section 9.6.2.1, Toxicity Information). This impact assessment finding would not change if xylenes are considered a potential human carcinogen. Large-volume spills are potentially a health hazard to people, and adequate prevention and response measures as described in the Draft EIS are required.

3.6.2. Short-term vs Long-term Exposures

Several public comments questioned the applicability of using ASILs as a threshold to assess potential health effects in the event of a spill, noting that ASILs are protective of long-term exposures rather than a short-term spill event. Cancer and other types of health effects are related to how much chemical exposure occurs and the length of time of the exposure. In other words, health effects can vary depending on whether the exposure occurs once (such as a spill event), or occurs regularly over a lifetime. The risk of a health effect generally increases in proportion to the “dose” of chemical received. The dose is understood as the total amount of a chemical (the concentration) deposited in the body and is typically calculated taking into consideration: 1) the amount of chemical a person is exposed to, 2) the frequency they are exposed (e.g., one time, or

¹ Genotoxicity refers to the property of a specific agent (radiation or chemical substances) to damage genetic information in a cell, thereby causing mutations or cancer.

once per week, or every day), and 3) the duration of the exposure (TEF 2015; USEPA 2005). Depending on the chemical and the toxic effect, it can be safe to breathe a higher concentration of a chemical for a short period of time, while longer-term exposures generally need to be at lower concentrations to protect health. Another consideration is the exposed population.

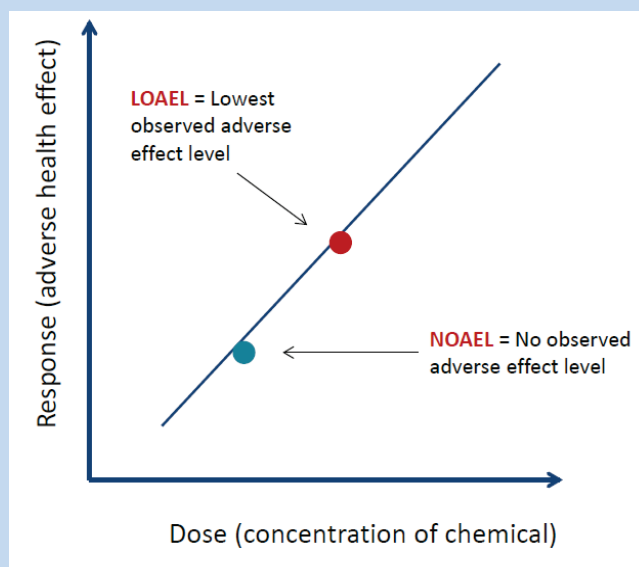
Workers, who are assumed to be a healthy adult population, can safely breathe higher concentrations of a chemical than the general population, which includes sensitive sub-populations, such as those with chronic illnesses, children, and the elderly.

Table 6 illustrates three different concentration limits based on different exposed populations (general public and workers) and either short-term or long-term exposure time periods for the four hazardous air pollutants that would be emitted in the event of a spill of xylenes or reformat. These three different concentration categories are as follows:

1. The ASILs are protective of the general public inhaling a chemical every day for a lifetime. In other words, the general public, including sensitive groups like children, could breathe the chemical at the ASIL concentration every day without adverse health effects. This is the value used in the Draft EIS to assess exposure risks in the event of a spill.
2. The USEPA AEGL-1s (or Acute Exposure Guideline Levels 1) are protective of the general public if the exposure period is 8 hours or less.
3. For workers, the Washington Industrial Safety and Health Act (WISHA) has established permissible exposure limits (PELs)² that assume daily exposures during a work shift over the

The Dose – Response Relationship

A fundamental principle of toxicology is that the dose determines the severity of the effect. This relationship is referred to as the dose-response, and means that lower doses have less of an effect. For most chemicals there is a threshold below which no adverse health effects are seen. This threshold is called the NOAEL (or No Observed Adverse Effect [or response] Level). The other important point on a dose response curve is the LOAEL (or Lowest Observed Adverse Effect Level). These two points are especially important when establishing the safe levels of chemicals.



² WISHA PEL is for an 8-hour work day; however the level is based on a lifetime exposure risk for workers.

course of a lifetime. These values assume that workers would not have adverse health effects if exposed to chemicals at levels equal to or below the PEL during the course of a work day.

Table 6: Air Concentration Limits for Hazardous Pollutants in Mixed Xylenes and Reformate

Hazardous Air Pollutants in Mixed Xylenes and Reformate	ASILs		AEGL-1		WISHA PELs TWA	
	ppm	µg/m ³	ppm	µg/m ³	ppm	µg/m ³
Xylenes	0.0509	221	130	564,450	100	434,190
Ethylbenzene	0.00009	0.4	33	143,290	100	434,220
Toluene	1.33	5,000	67	252,490	100	376,850
Isopropylbenzene (cumene)	0.08137	400	50	245,800	none	none

µg/m³ = micrograms per cubic meter; AEGL-1 = Acute Exposure Guideline Levels 1; ASIL = acceptable source impact level; PEL = permissible exposure limit; ppm = parts per million; TWA = time weighted average; WISHA = Washington Industrial Safety and Health Act

Note. A spill of xylenes would contain xylenes and ethylbenzene. A spill of reformate would contain all four of the listed chemicals.

As shown in Table 6, if the exposure is 8 hours or less, much higher concentrations of chemical are safe to breathe than if the exposure was regular and long-term. The Draft EIS concluded that health effects in the event of a spill were potentially significant because the ASILs could be exceeded for up to 24 hours. Use of the ASILs as a threshold for assessing spill impacts is a very conservative approach because an individual could breathe xylenes and other hazardous air pollutants at concentrations much higher than their respective ASILs for a short time without adverse effects. For workers involved in spill cleanup, the PELs would be the applicable concentrations that workers could breathe without respiratory protection.

Some commenters were concerned that xylenes were odorless and therefore, they would not know if an exposure was occurring. Xylenes have an odor and can be smelled at a concentration of about 1 ppm (ATSDR 2017). Because the “odor threshold” of 1 ppm is well below the PEL and the AEGL-1, the chemical can be smelled at a level that is not harmful for a short exposure, allowing people to move upwind.

The 1,000-barrel (bbl) xylenes spill in the Mississippi in April 2003 (discussed further in Draft EIS Section 9.6.2.4, Impacts on Health from Spill Response) found most measured xylene concentrations were below the PEL of 100 ppm immediately following the spill, when concentrations would be expected to be at their highest. Xylenes were not detected in the air approximately 8 hours after the spill event (NOAA 2003). This spill event information confirms the potential for high concentrations, potentially above short-term limits as well as long-term limits, for a short time after a spill event.

The Draft EIS took a conservative approach, as described above, to estimating the potential for an adverse human health effect in the event of a spill. However, the conclusions that a large volume spill (worst-case or maximum most probable spill scenario in the Draft EIS) could be **potentially significant** for humans appear appropriate given the unknowns in the location and volume of any spill event.

3.6.3. Safety Considerations

The public commented on Tesoro's safety record, and specifically requested additional information on the status of the CSB recommendations that were made to address the 2010 heat exchanger explosion. Commenters expressed interest in CSB recommendations that Tesoro document, implement, and survey its safety culture program. Based on these comments, Tesoro provided information about their safety culture program and the status of CSB recommendations (Tesoro 2017a):

- Documentation and implementation of a Safety Culture Program:
 - CSB recommendation remains open.
 - Elements developed and implemented by Tesoro include establishment of a Process Safety Council (2015 and 2016), survey of refinery safety culture, and completion of a process safety workshop by operations and maintenance personnel.
 - Safety culture survey results will be used for further program development.
 - Employee engagement on survey results and program is planned (June and July 2017).
- Safety culture surveys:
 - CSB recommendation is complete.
 - Employees and contractors were surveyed across refining locations (August 2016).
 - Surveys incorporated questions developed as a part of Tesoro's Golden Eagle refinery survey under the Contra Costa County Industrial Safety Ordinance.
 - Subsequent safety survey was developed by the refinery's Process Safety Council (October and November 2016).
- Communicating safety learning to workforce:
 - Internal database tracks all safety incidents and shares information about serious incidents immediately across Tesoro locations.
 - "Safety Flash" communications are developed in response to serious incidents within about a week and shared with workforce at mandatory monthly safety meetings and through Tesoro's internal website.

3.7. SOCIAL AND ECONOMIC ENVIRONMENT

The social and economic analysis evaluated how the proposed project might affect social or economic conditions in local communities. The analysis assessed whether the proposed project would affect housing, public services available in communities, and economic activity, as well as jobs or other livelihoods that may have socioeconomic and/or cultural importance (see Draft EIS Chapter 11, Social and Economic Environment).

Comments were received on the Draft EIS regarding the way in which Tesoro coordinates emergency response activities with the local community and requesting additional information on who pays for spill cleanup. These issues are discussed below.

3.7.1. Emergency Response Planning and Coordination with Local Services

Tesoro's training and planning for emergencies involves the local communities and local emergency services, as discussed in Draft EIS Sections 11.4, Public Services, and 9.6, Unplanned Events. Based on comments on this topic, Tesoro has provided additional information about their community planning and training activities. This information is included in Appendix C, Additional Information Provided by Applicant, and is summarized below.

- Annual spill drill participation and observation with many members of community organizations participating in the exercise, including:
 - Skagit County Department of Emergency Management
 - Representatives from the Swinomish Indian Tribal Community and Samish Tribe
 - Island Oil Spill Association
 - Washington State Department of Fish and Wildlife
 - Anacortes Police
 - Mount Vernon Police
 - Skagit County Sheriff
- Member of the March Point Community Awareness Emergency Response Group, a joint industry and local agency group (including representatives from local hospitals), preparing emergency response plans for use by community leaders
- Mutual Aid Agreements with other refineries in the state of Washington as well as local fire departments
- Sponsor of specialized training for local municipal emergency responders
- Anacortes Community Tesoro Advisory Group, an independent advisory group of community residents that interface between the local community and Tesoro management
- Community Investment into Emergency Response and Preparedness, a grant program funded by Tesoro that provides financial support to various local emergency response organizations, such as Skagit 911, several local fire districts and associations, local American Red Cross groups, and the Anacortes Police
- Member of the Local Emergency Planning Committee, which is part of a federal and state regulatory program to ensure local emergency response plans are developed, updated yearly, and fully address local hazards

3.7.2. Cleanup Costs in the Event of a Spill

Several comments on the Draft EIS raised the question of who would pay for the cleanup in the event of a spill. Costs associated with cleaning up spills and paying damages to those that have been harmed by a spill are covered under federal regulations. If the responsible party (the “spiller”) cannot pay, there is a federal fund available to pay all costs, including compensation for damages. The responsibilities are apportioned in the following manner:

- Tesoro is responsible for accidents at the refinery or refinery wharf.
- The independent vessel owner that is transporting xylene or reformat is responsible for cleaning up spills to marine waters once the vessel leaves Tesoro’s wharf.

The federal regulations that govern xylene spills are twofold. Xylene has characteristics very similar to many oil products, which are regulated under the Clean Water Act (CWA), as amended by the Oil Pollution Act of 1990 (OPA 90). Xylene and reformat, when they are suspended in fuels or oils, are regulated under OPA 90. Xylene manufactured by the refinery is regulated under the CWA as amended by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The equivalent state-level regulations for OPA 90 and CERCLA are WAC 173-181 and WAC 173-340, respectively. Parties responsible for a spill would be subject to both federal and state regulations.

Xylene spills must be reported for any amount at or above 100 pounds (40 Code of Federal Regulations [CFR] 117.3). Xylene is designated a hazardous substance under 40 CFR 116. Both CWA amendments (OPA 90 and CERCLA) require a party deemed responsible for spilling those products into navigable waters of the U.S. to incur the costs of its removal and provide compensation for associated damages (33 United States Code § 2702).

OPA 90 and CERCLA both contain government-administered trust funds to address cleanup costs in the event that a responsible party is unable to do so. The U.S. Coast Guard (USCG) is responsible for administering those funds in the coastal environment (see Draft EIS Table 13-1 and Final EIS Table 2 for additional information). OPA 90 and CERCLA also have a provision for compensating those harmed by a spill or spill cleanup. Injury, destruction, or loss affecting natural resources and real or personal property may result in damages that are compensable under OPA 90. Costs associated with providing incremental public services during or after removal activities may also be compensated.

3.8. CULTURAL RESOURCES

The Draft EIS evaluated how the proposed project might affect resources that are listed or are potentially eligible for listing in the National Register of Historic Places (NRHP). This includes archaeological sites, buildings, structures, and districts; sites listed in the Washington Heritage Register; traditional cultural properties, cultural landscapes; and cemeteries and burial sites, which may involve additional protections under state and federal laws. Archaeological resources can be prehistoric, historic, or both, and are found at the ground surface or below ground surface. Prehistoric archaeological sites are generally considered to have been occupied before the arrival of European Americans and historic archaeological sites are considered to have been occupied

after the arrival of European Americans. Buildings and structures are collectively referred to here as “architectural resources” or the “built environment,” and are typically associated with resources that date after European American contact with Native American groups (see Draft EIS Chapter 12, Cultural Resources).

The impact analysis methodology in Draft EIS Chapter 1, Introduction, and Draft EIS Appendix 1-B, Impact Criteria Tables, was applied uniformly across all resource areas, including cultural resources.

3.8.1. Tribal Resources

Comments on the Draft EIS were provided by the Swinomish Indian Tribal Community, the Tulalip Tribes, and Suquamish Tribe.

The Tulalip Tribes and Suquamish Tribe commented that the Draft EIS did not acknowledge that the project and marine transportation route is located within each tribe’s usual and accustomed areas. Additionally, the increase in marine vessel traffic could result in cumulative impacts on commercial and tribal fisheries.

The Swinomish Indian Tribal Community provided a detailed comment letter that included three appendices regarding 1) air quality on tribal lands, 2) cultural resources on March Point, and 3) vessel traffic. The County’s initial review of tribal resources is contained within multiple chapters of the Draft EIS, including Chapters 11 and 12. For ease of reference, all comments relating to tribal resources are addressed in this section. Specifically, air quality and cultural resources on March Point are addressed in Sections 3.8.1.1, Modeling Meteorological Data Selection and Tribal Land Impact, and 3.8.1.3, Point Elliott Treaty Signatories and Treaty Rights, below. Comments about the vessel traffic analysis in the Draft EIS included impacts on tribal fisheries outside the immediate project area, including Vendovi anchoring and bunkering areas, and comments on spill modeling. Additional analysis of marine vessel anchorage in the Vendovi area and on potential vessel fishing impacts is provided in Sections 3.8.1.4, Marine Vessel Anchorages, and 3.8.1.5, Direct Impacts of Vessel Use, Spills, and Access to Fisheries. Comments related to spill modeling and spill likelihood are addressed in Section 3.9, Marine Transportation, in addition to the responses provided in Appendix A, Draft EIS Comments and Responses. This additional analysis did not result in changes to the findings of the Draft EIS. Based on comments regarding the archaeological assessment of the New Tanks Area and the potential for buried cultural resources to be present, Skagit County included mitigation measures as described in Section 3.8.1.2, Archaeological Study, and Chapter 4, Mitigation, of this Final EIS.

3.8.1.1. Modeling Meteorological Data Selection and Tribal Land Impact

The Swinomish Indian Tribal Community operates air quality monitors within the project vicinity. It was suggested that data from these monitors should have been used to analyze potential air quality impacts to tribal lands. For ambient air quality impact assessment areas (using AAQS) and ASIL, a 50-kilometer (km) (31 miles) study area was assessed that encompasses the full air dispersion modeling domain. This region also covers the extent of the

Swinomish Indian Tribal Community lands near the proposed project. The Draft EIS determined that air quality impacts to tribal lands would be less than significant. Draft EIS Figure 4-1 shows a smaller modeled domain within the 50-km (31 miles) study area, referred to as an area of influence. This smaller area is where the model predicts the highest concentrations of chemicals from the proposed project's operations. Within this smaller area of influence, having the highest predicted concentrations, the pollutant concentrations are considered less than significant. Draft EIS Tables 4-8, 4-9, and 4-10 (see Draft EIS Section 4.4.2.1, Impacts on Air Quality) all demonstrate concentrations less than the AAQS and ASIL.

The Bartholomew Road Station ambient air quality background monitor was selected for PM_{2.5}³ analysis as it best represents the ambient background concentrations near the proposed project. This station is closer to the proposed project than the Swinomish Indian Tribal Community's air quality monitoring station and is closer to other sources of pollution in the area that would result in the highest potential emissions. For other pollutants, an approved Ecology model was used to provide background concentrations.

The air quality modeling from a potential spill scenario identified conditions in which the spilled material would spread out the quickest and therefore modeled a conservative area around the proposed project potentially affected by the spill. Further, the air quality dispersion modeling conservatively assessed real-world wind conditions based on the 2010 to 2014 meteorological data. During this meteorological data timeframe, the wind blew from the northwest quadrant roughly 18 percent of the time, resulting in the potential high impacts around and on Swinomish Indian Tribal Community land. Therefore, the Draft EIS adequately analyzed scenarios in which the spilled material could impact Swinomish Indian Tribal Community lands.

The criteria pollutants regulated under the AAQS include ozone, which is produced in the lowest part of the atmosphere (the troposphere) by precursor pollutant emissions of nitrogen oxides (NO_x) and volatile organic compounds (VOCs). Air quality impacts to ozone are anticipated to be less than significant for the proposed project.

The ambient monitor in La Conner (AQS Site ID: 53-057-0020), operated by the Swinomish Indian Tribal Community, has the most recent 3 years (2012-2014) of data that meet USEPA completeness criteria for ozone and its precursors from the three monitors in the area. The 2012-2014 data demonstrate compliance with the 8-hour ozone National AAQS (NAAQS) at 48 parts per billion (ppb). This leaves 22 ppb of room between the recently updated 70 ppb standard and the current background concentration.

The proposed project would reduce facility VOC emissions by 327 tons per year and the new NO_x emissions increase would be 37 tons per year, which is below the Significant Emissions Rate for NO_x. Therefore, no ozone modeling was required by the agencies. The NO_x emissions for the combined March Point facilities were 2,993 tons per year in 2011. The proposed project's NO_x emissions represent a 1.2 percent increase in the area.

³ Particulate matter less than 2.5 microns in diameter

The VOC emissions for the combined March Point facilities were 1,098 tons per year in 2011. The proposed project's VOC reduction would contribute a 29.8 percent reduction in the area. Therefore, the proposed project's net ozone precursors would be a reduction over current levels, would not cause any exceedances of the ozone NAAQS on Swinomish Indian Tribal Community land, and has a less than significant impact based on the methodology described in Draft EIS Section 4.2.2, Methodology.

Toxic air pollutants were modeled for the entire 50-km (31 miles) study area, which includes Swinomish Indian Tribal Community lands. The Draft EIS concluded that toxic air pollutants impacts would also be less than significant for the entire study area (see Draft EIS Table 4-10). Overall, analysts reviewed the air monitoring locations used in the Draft EIS and determined that the locations used were adequate and in some cases would be considered conservative in terms of evaluating impacts to tribal lands because the locations used were closer to the source of pollutants than the Swinomish Indian Tribal Community's air quality monitors. Therefore, the project emissions would not result in a significant impact to the Swinomish Indian Tribal Community lands and there are no changes to conclusions in the Draft EIS.

3.8.1.2. Archaeological Study

The archaeological technical memorandum for the project reports that the geotechnical borings in the New Tanks Area identified up to 7 feet of modern fill overlying native soils. Therefore, the archaeological investigation of the New Tanks Area consisted of mechanically excavating six trenches measuring approximately 4 feet by 10 feet to a depth of 8 feet below ground surface to identify potential archaeological resources below the modern fill within the native soils. Safety restrictions prevented the archaeologist from working in the trenches. Given the dimension of the trenches it would have been difficult to observe the wall profile from outside the trenches so the excavated spoil piles were examined for the presence of cultural resources.

The proposed project would include grading of up to 25 feet. In the tank construction area, grading would consist of excavations of about 14 to 25 feet (greatest along the east side of the New Tanks Area), as well as fills of up to about 14 to 22 feet (greatest along the west side of the tanks/perimeter access road).

Based on this information and in response to comments, a mitigation measure has been added to this Final EIS requiring Tesoro to prepare and implement an Archaeological Monitoring Plan during construction. This plan is included in the mitigation for the proposed project described in Chapter 4, Mitigation, of this Final EIS.

The New Tanks Area has the potential to contain archaeological sites below modern fill. Therefore, focused monitoring of the removal of modern fill during construction in this area will be undertaken. Monitoring would be performed by Tesoro's archaeologist. Additionally, the Swinomish Indian Tribal Community would have the option of providing a Tribal Archeologist to perform monitoring. Archaeological monitoring would entail having an archaeologist(s) present during ground disturbing activities that may intersect native soils to observe subsurface conditions. Monitoring would be used to identify potential buried surfaces, archaeological material, features such as hearths or midden material, or strata that may contain cultural

materials. Monitoring would proceed until it is determined that cultural resources are not likely to be impacted by construction or are not present. The continuation of monitoring depends upon factors such as the stratigraphy of the deposits, spatial distribution of native soils across the New Tanks Area, and presence of cultural materials. Upon completion of monitoring, a report will be prepared addressing the methods employed and the results of the work. If cultural resources are identified during monitoring, the report will also include a cultural context for interpreting the finds, including discussion of tribal ethno-history, prepared in accordance with Washington State Standards for Cultural Resources Reporting (DAHP 2015).

3.8.1.3. *Point Elliott Treaty Signatories and Treaty Rights*

The Draft EIS listed the Duwamish Tribe, Suquamish Tribe, Snoqualmie Tribe, Snohomish Tribe of Indians, Lummi Nation, [Upper] Skagit Tribe, Swinomish Tribe, and others as signatories to the Point Elliott Treaty (see Draft EIS Chapter 11, Social and Economic Environment, and Draft EIS Table 11-1). Additional tribes that were signatories to the Point Elliott Treaty include the Stillaguamish Tribe, Skokomish Tribe, and Samish Tribe (Treaty of Point Elliott Treaty 1855).

3.8.1.4. *Marine Vessel Anchorages*

Commenters requested that the study area be expanded to include the Vendovi Island anchorage. The anchorage area is outside the proposed project shipping lane and would not be impacted by a spill in the shipping lane. If a vessel cannot dock at a marine terminal because the capacity of the marine terminal is full, it is possible that a vessel may need to anchor at a nearby anchorage location and act as a floating storage unit. For the proposed project, anchorage could be done with full reformat vessels (ATBs), if there is a delay in reformat transfer at the refinery wharf. Tankers would be filled with xylenes at the refinery wharf and a tanker would not need to wait for wharf access in a “full” capacity. Since floating storage in a tank ship is substantially more expensive than land storage, cargo transfers would be completed as quickly as possible when chartering a tank or ATB vessel service. When vessels are at anchorage, future orders for ship services are delayed for cost-saving reasons. Accordingly, the use of the Vendovi Island anchorage by full reformat vessels associated with the proposed project is unlikely. Thus, the proposed project will not likely increase demand for or use of anchorages.

Commenters also raised issues about bunkering activities at nearby anchorages. The USCG manages anchorage areas and regulates the activities within anchorage areas, which includes bunkering. Consequently, expanding the vessel traffic study area to include the Vendovi Island anchorage area would not change the conclusions of the Draft EIS that anchorages would not be significantly impacted by the proposed project activities (see Draft EIS Section 13.3, Vessel Traffic).

Proposed rulemaking by the USCG (82 Federal Register 10313, February 10, 2017) would establish new anchorage areas throughout Puget Sound, including some near the marine vessel transportation route, and would require all large vessels over 200 feet in length (including tankers and ATBs) to anchor only in designated anchorage areas. Current regulations do not include this requirement for any vessel. According to the background information provided by

the USCG Captain of the Port Sector Puget Sound regarding the proposed rule listed above, these new anchorage areas are already in use informally by the USCG Vessel Traffic Service in conjunction with the support of the maritime community. The USCG stated that these informal anchorage areas have “improved the safety of maritime traffic” within the Salish Sea (82 Federal Register 10313). The USCG now seeks to formalize the establishment of these anchorages areas, which currently do not appear on nautical charts, are not referenced in the Coast Pilot (a formal navigational publication used by mariners), and are not subject to certain regulations that would allow USCG enforcement authority. The informal Vendovi Island anchorage area has been in use for many years. According to the USCG, the Vendovi Island anchorage area is one of several informal anchorage areas that it seeks to formalize in regulations. By doing so, the USCG states that these additional regulations would provide mariners with more accurate nautical charts and allow the USCG to impose additional regulations to manage those areas to increase safety. By further codifying these anchorage areas, the USCG states that it would “improve the safety of all Puget Sound waterway users” (82 Federal Register 10313).

While the effects of this proposed rule on vessel traffic, safety, and spill likelihood cannot be predicted, this rule would likely improve the ability to track and manage tanker anchorage activity and increase safety in those areas.

3.8.1.5. Direct Impacts of Vessel Use, Spills, and Access to Fisheries

Comments received on the Draft EIS indicated concerns about potential impacts resulting from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas. In general, the 120 total movements per year associated with the proposed project represent approximately two to three vessel movements per week throughout operation. Changes in vessel traffic itself are not necessarily proportional to changes in spill likelihood. The spill risk estimates in the Final Vessel Traffic Risk Assessment (VTRA; Merrick and Van Dorp 2017) (the “VTRA II”, as cited in the comment), are incorporated into Draft EIS Section 13.5, Marine Spills and Spill Response. These estimates incorporate the increased vessel traffic, along with other factors, such as improved tanker design and navigation safety protocols in assessing potential spill risk. As stated in Draft EIS Section 13.4.2.2, Impacts on Vessel Safety from Operations and Maintenance, the protections provided by the vessel traffic management systems (described in Draft EIS Section 13.4.1.2, Waterway Management) would minimize project-related vessel safety risks, inclusive of marine accidents and marine casualty events.

Such activity is unlikely to significantly alter marine vessel traffic patterns and schedules.

Moreover, tribal activities and resources are directly related to elements of the environment that the County assessed in the Draft EIS and in this Final EIS. Impacts to marine resources from potential loss or changes to habitat or changes to water quality are directly relevant to tribal fishing activities that rely on those marine resources. As explained in the Draft EIS this Final EIS, potential impacts associated with the proposed project to marine resources will be less than significant. Consequently, based on the information the County has analyzed, which includes all the information provided by commenters, the proposed project is not expected to result in activities that would significantly reduce access to traditional fisheries. Additionally, the County

lacks sufficient information to support a finding of probable significant adverse impacts to tribal fishing rights. The County recognizes that additional information on tribal resources may become available through a formal consultation between the U.S. Army Corps of Engineers and the Tribes.

In response to the comments provided by the Tribes, Tesoro has offered the following voluntary commitments:

- Tesoro will donate up to three spill response trailers equipped with spill response equipment to be staged for deployment in the event of a spill. Tesoro is offering one of the trailers to each of the three Tribes that provided comments on the Draft EIS (Swinomish Indian Tribal Community, Suquamish Tribe, and Tulalip Tribes). It is envisioned that each tribe will manage their own response trailer and Tesoro will provide training on deployment strategies.
- Tesoro will also provide training to the tribes on the most accurate methods for monitoring vessel traffic between Neah Bay and the Tesoro Anacortes Refinery.

3.8.1.6. Cumulative Impacts

With respect to potential cumulative impacts to marine resources, as noted above, potential loss or changes to habitat or water quality are directly relevant to tribal fishing activities that rely on those marine resources. Based on the information the County has analyzed, including information provided by commenters, this additional information did not result in changes to the findings of the Draft EIS, and the potential cumulative impacts associated with the proposed project to marine resources will be less than significant. After reviewing the comments provided on the Draft EIS, the analysis performed based on the methodology described in Draft EIS Section 1.7, Methodology, and discussed here and in Appendix A of this Final EIS indicates that conclusions reached in the Draft EIS have not changed.

3.8.2. San Juan Islands National Monument and San Juan Island National Historic Park

Comments were also provided about potential impacts to the San Juan Islands National Monument and the San Juan Island National Historic Park. Potential impacts to these areas are discussed in additional detail below.

3.8.2.1. San Juan Islands National Monument

The study area assessed in Draft EIS Chapter 10, Land Use and Shoreline Use, included several islands and features that are part of the Monument, including: Fauntleroy Rock, Dot Island, Reads Bay Island, Lopez Pass, Cape St. Mary, Chadwick Hill, Watmough Bay, Point Colville, Davis Bay Island, Richardson Island, two unnamed rocks/islands, Richardson Rock, Mackaye Harbor Rocks, Outer Bay Rocks, Iceberg Point, Iceberg Point Rocks, and Reservation Bay Rocks. Additional information is presented here regarding the cultural importance of the Monument in response to comments received on the Draft EIS.

The Monument was designated on March 25, 2013 (Proclamation 8947), to “maintain their historical and cultural significance and enhance their unique and varied natural and scientific resources.” The Bureau of Land Management (BLM) co-manages the Monument with the USCG. Of the 1,000 acres of land within the Monument, about 300 acres are managed by the USCG; however the USCG will eventually relinquish the 300 acres to the BLM. To date, BLM has not developed a Resource Management Plan to guide the management of this Monument (BLM 2016).

The Proclamation states that historic and cultural values are among the resources for which the Monument was established. The Monument’s cultural values include:

- Archaeological sites, buildings, structures, and places with historical and/or cultural values
- Properties associated with traditional use for fishing, hunting, gathering, and other activities by Native American tribes who continue to utilize and value the lands and resources in the Salish Sea region
- Cultural landscapes, including coastal grasslands and meadows that contain culturally important plant species

The BLM has inventoried a portion of the Monument for cultural resources and documented 21 cultural sites associated with Native American habitation and European American settlement and use. Most of the sites have not been evaluated for their NRHP eligibility. However, Patos Light Station is listed in the NRHP and Turn Point Light Station is eligible for listing in the NRHP.

The BLM (2016) may use the following indicators to assess potential impacts on cultural resources, which they would outline in a Resource Management Plan:

- The extent to which values that contribute to or diminish the significance of cultural resources are affected
- The extent to which the availability of cultural resources for appropriate uses such as access to Native American spiritual sites or areas of traditional religious or cultural importance would be affected
- The extent to which the cultural resource setting (such as visual and audible factors), where it is relevant to the historic value or importance of cultural resources, would be affected

No direct project impacts on these cultural sites are anticipated since they are far-removed from the refinery and the marine transportation route and since the proposed project is not expected to affect any of the historic and cultural values for which the Monument was established.

3.8.2.2. *San Juan Island National Historical Park*

Congress established San Juan Island National Historical Park on September 9, 1966, to commemorate a period of U.S. history between 1830 and 1860 when land disputes over national boundaries were common in Puget Sound. The park encompasses about 1,752 acres, is located within the boundaries of the San Juan Islands National Monument, and preserves the NRHP-listed sites of the American and English camps. Most of the original structures of these camps dating between 1859 and 1872 have disappeared (NPS 2007).

American, British, and Canadian citizens had property claims on San Juan Island. In 1859, a dispute over an American settler's shooting of a pig owned by a Hudson's Bay Company officer started the "Pig War." A joint military occupation of San Juan Island lasted for 12 years beginning in 1859. The British Royal Navy occupied the British Camp on the north end of the island and the American Army occupied the American Camp on the south end of the island. In 1871, the Treaty of Washington was signed and the San Juan Islands became American possessions (NPS 2016).

The park also contains important pre-contact archaeological sites. Evidence of the first inhabitants of San Juan Island was documented by the National Park Service on a bluff above American Camp and dates to between 7,000 and 9,000 years ago. Archaeologists have suggested that permanent occupation of the island began between 1,500 and 2,500 years ago. At the time of European contact, the native people were members of Central Coast Salish tribes (NPS 2012).

The Draft EIS discusses resources within the Salish Sea that could be impacted by the proposed project, including the San Juan Islands National Monument, in Draft EIS Section 10.4.1, Affected Environment, and analyzes potential impacts to those resources in Draft EIS Section 10.4.2, Potential Impacts on Recreation.

3.9. MARINE TRANSPORTATION

The marine transportation analysis covered vessel traffic changes due to the proposed project. The impact analysis focused on whether traffic increases would affect vessel safety and on the potential for a spill of xylene or reformates (see Draft EIS Chapter 13, Marine Transportation). The area evaluated was the marine transportation corridor from the refinery wharf to the Pacific Ocean, shown on Figure 2 of this Final EIS.

Comments on the Draft EIS were received regarding the assumptions around vessel types and vessel traffic, and questions about the spill modeling, spill likelihood, and spill response information. Additional information on these topics is provided below.

3.9.1. Vessel Types and Traffic

3.9.1.1. Recreational Boating

Comments were received requesting more information on how a spill might impact recreational boating. The information presented here expands on the baseline recreational boating discussion in Draft EIS Section 10.4.1.2, Recreational Activities. According to a 2007 Washington boating survey, 35 percent of boaters in the state boated in Puget Sound and 8 percent boated in the Strait of Juan de Fuca (Duda et al. 2007). This includes all types of motorboats, personal watercraft, sailboats, and canoes/kayaks. In 2016, there were 17,567 vessels registered in Skagit, Island, San Juan, and Clallam Counties—the counties that include the marine vessel transportation route (WSDOL 2017).

As stated in the Draft EIS Section 10.4.1.2, Recreational Activities, recreational boating is a popular activity in the study area. Data on the recreational use of specific waterways are not available, although the number of registered vessels and marinas suggests that such activity is

common along the marine vessel transportation route. Because the additional vessel traffic due to the proposed project is only a small percent increase in large commercial vessel traffic, it is not anticipated to adversely impact recreational boat use in the area.

3.9.1.2. Vessel Type

Commenters requested additional information be added describing the vessels that the proposed project would add, specifically that not all the additional vessels of the 60 total vessels per year would be tankers. The descriptions of the three types of proposed project vessels presented in Draft EIS Section 13.3.2.2, Impacts on Vessel Traffic from Operations, have been revised as described below. The remainder of this chapter presents additional information relevant to comments received, and summarizes some information already contained in the Draft EIS.

- Tankers: Tankships (as defined in 46 CFR 2.10-25 [see Draft EIS Table 13-1]) with their own power source that carry petroleum-based products. Tankers for the proposed project would transport mixed xylenes product from the refinery after being loaded at the refinery and exported to global markets, and would constitute approximately 30 percent of the vessels that call at the proposed project (CH2M Hill et al. 2016). Tankers have a capacity of 330,000 bbl (CH2M Hill et al. 2016). Only 30 percent of the vessels that call at the refinery wharf due to the proposed project would be tankships (about 18 to 20 vessels per year).
- Tug-barges, including: a tank barge (as defined in 46 CFR 2.10-25 [see Draft EIS Table 13-1]) tethered to and propelled by a dedicated tug. ATBs are a specific type of tug-barge combination (Tradewinds 2017). ATBs would be used to transport reformate to the refinery from Pacific Northwest sources and would constitute approximately 70 percent of the vessels that would call at refinery wharf due to the proposed project (about 40 to 42 vessels per year [Tesoro 2017b]). ATBs have a capacity of approximately 180,000 bbl (Tesoro 2017b).
- Assist tugs: Assist tugs would provide maneuvering assistance to tankships during transit and during mooring and unmooring operations. These vessel types and sizes are comparable to those currently found in waterways within the study area.

As noted above, less than one-third (30 percent) of the vessels anticipated to be used for the proposed project would be tank vessels with the internal cargo capacity to carry volumes of mixed xylenes of 330,000 bbl – the volume used in the worst-case spill modeling scenario. All tank vessels with these cargo capacities have been built to stringent international maritime engineering standards. The International Convention for the Prevention of Pollution from Ships, also known as MARPOL, Annex I (Chapter 4.A.20) (International Maritime Organization 1974) requires these vessels to be constructed with double hulls and double bottoms. These regulations would also be applicable to the barge portions of the second type of vessel identified above, the ATB. In compliance with the requirements of international maritime law, both the tank vessels and ATBs would have state-of-the-art navigation warning systems known as Automatic Identification Systems. These systems are a direct interface with USCG and Canadian vessel traffic avoidance control systems in the Salish Sea. Both tank vessels and ATBs are required by USCG regulations in 46 CFR 15.812, to have a federal licensed pilot on board during transits of

the Salish Sea. The USCG-licensed pilots are familiar with the unique geography and local operations of the Puget Sound and Salish Sea. Finally, in concert with USCG waterways management, an emergency response towing vessel (the “rescue tug”) is stationed in Neah Bay, staffed continuously, and available 24 hours a day, 7 days a week to assist any vessel that has failed or reduced navigation capabilities. In addition, both the refinery and the independent marine vessels contract with oil spill response contractors who could respond to an emergency towing situation.

Navigational factors that are present within the Salish Sea designed to mitigate vessel-related incidents from tank vessels and ATBs in addition to what was included in Draft EIS Chapter 13, Marine Transportation, are the use of closed-circuit TV monitoring of critical passages.

3.9.1.3. Impacts on Ferries

Commenters requested information on how the proposed project might affect Washington ferry routes. Additional information on the ferry routes that could be impacted in the event of a marine spill, and the analysis of those impacts, are provided below.

Three Washington commercial ferry routes cross the marine vessel transportation route, as described in Table 7.

Table 7: Ferry Routes Crossing the Marine Vessel Transportation Route

Route	Operator	Weekday Daily Scheduled Trips	Marine Vessel Transportation Route Waterbodies Crossed
Anacortes/San Juan Islands/Sidney, B.C.	WSDOT	46	Guemes Channel, Rosario Strait
Victoria Clipper (Seattle to Victoria, B.C.)	Victoria Clipper	14	Strait of Juan de Fuca
Black Ball Ferry (Port Angeles to Victoria, B.C.)	Coho Ferry	8	Strait of Juan de Fuca

Sources: WSDOT 2017; Clipper Vacations 2017; Black Ball Ferry Line 2017

If a spill were to occur along or near one of Washington State’s ferry routes, ferry operations could be delayed or temporarily halted. Other spill scenarios would result in smaller blockages. As discussed in the Draft EIS Section 13.5.6, Spill Likelihood, such events would be extremely unlikely to occur. Further, Washington State Ferries (WSF), which is responsible for operating the ferry services that coincide with the marine vessel transportation route for the proposed project, has an established safety plan that includes the following components (WSF 2003):

- Adoption of a fleet-wide Safety Management System (international and domestic routes) to provide a means to enhance the safety culture throughout the organization and systematize the process for continuous improvement
- A centralized operations center, including automated dispatch support system, to ensure trained and qualified crewmembers

- A WSF emergency operations center to ensure a means to respond in a responsible manner in the event of an incident
- A safety systems manager and a Safety Coordination Team that utilizes a matrix management concept to oversee WSF's safety systems

These systems are in place to both ensure the safe operations of the ferry system as well as to be prepared to maintain ferry services in the event of an emergency.

The Draft EIS indicates that there could be significant, although temporary, impacts to vessel traffic in the event of a worst-case spill event; however, ferries were not specifically addressed in the Draft EIS. While it is true that access to some portions of ferry routes could be affected in the event of a worst-case spill, these impacts would be temporary and the WSF emergency operations center would be expected to work with the USCG to restore or re-route ferries to maintain and restore standard ferry service as soon as possible. Delays in ferry service could occur, but even these delays would be expected to be short in duration. Given that any impacts to ferry service are expected to be short-term even in the event of a worst-case spill, and accounting for WSF's safety and emergency protocols that are in place to maintain and restore ferry service in the event of an emergency, the potential impacts of a worst-case spill on ferry traffic would be *less than significant*.

3.9.1.4. Clarification of Marine Vessel Traffic Analysis

Commenters requested additional clarification of the statement in Draft EIS Section 13.3.2.2, Impacts on Vessel Traffic from Spills and Spill Response, that "there is no meaningful difference between tankships and the other large vessels."

The full statement in Draft EIS Section 13.3.2.2, with emphasis added in bold, is as follows: "in terms of **impacts on marine vessel traffic**, as defined in Section 13.2.2, and **not including** vessel safety or spill impacts, there is no meaningful difference between tankships and the other large vessels included in Tables 13-4 and 13-9." This statement applies *only* to the analysis of the number of vessels, as compared to the carrying capacity of the affected waterways. It *does not* apply to the analysis of vessel safety (i.e., the likelihood of a marine casualty event, as evaluated in Draft EIS Section 13.4, Vessel Safety), and *does not* apply to the analysis of changes in the risk of spills of xylenes and reformates associated with the proposed project, as evaluated in Draft EIS Section 13.5, Marine Spills and Spill Response.

Commenters questioned whether a tanker carrying 330,000 bbl of xylene or reformates would weigh 40,000 deadweight ton, the minimum threshold above which state law requires tug escorts. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.

As stated in Final EIS Section 3.9.1.2, Vessel Type, tankships, including tankers, tug-barge, and ATBs carrying xylenes and reformates would require Puget Sound licensed pilots within the study area in accordance with the Washington State Pilotage Act, regardless of tonnage.

The VTRA (Merrick and Van Dorp 2017) refers to the “Tacoma Anacortes Upgrade” as a component of the US232 What If scenario. We assume that this is an error on the part of the VTRA authors, and that the VTRA meant to include the “Tesoro Anacortes Upgrade” in the US232 What If scenario. As such, the text in Draft EIS Section 13.5.6, Spill Likelihood, is incorrect, and should be revised as follows:

The VTRA did not evaluate how spill likelihoods would change solely with the addition of project-related marine vessel traffic (i.e., 120 total vessel movements per year carrying xylenes and/or reformate); however the VTRA did evaluate a scenario that included the proposed project (inadvertently described as the “Tacoma Anacortes Upgrade”), along with several other potential projects, generating 232 additional tanker and ATB trips from U.S. ports.

3.9.2. Spill Modeling

Commenters questioned several aspects of spill modeling:

- Why vessel fuels were not included in the modeling
- Whether spill modeling results would be different under non-instantaneous or more adverse weather conditions
- Uncertainties related to the use of the General NOAA Operational Modeling Environment (GNOME) and Automated Data Inquiry for Oil Spills (ADIOS2) models
- Assumptions about the modeled thickness layers of product on top of the water
- Estimations of dissolved concentrations in the water column

These topics are further discussed below.

3.9.2.1. Vessel Fuels

In the event of a worst-case, or maximum most probable spill discharge, fuel from the vessel could be leaked along with the xylenes or reformate product. Analysis of fuel spills was not included in this study because vessel fuel spills are not a unique feature of this proposed project. Vessel fuel spills have already been modeled in detail in previous risk assessments performed in the Salish Sea for Ecology (French-McCay et al. 2005) and the range of scenarios modeled would account for any new marine vessel traffic associated with the proposed project. Therefore, there would be no changes in analysis or risk assessment results due to the proposed project. The fuel volumes modeled in the previous studies were based on oil tanker cargo presently traversing the Salish Sea and the proposed project would not significantly increase the fuel volumes that were modeled. Note that the fuel volumes required for the transport of xylenes and reformate would be 30 to 50 times less than those in tankers. Since analysis of fuel spills was not included in this study because vessel fuel spills are not a unique feature of this proposed project, there are no changes to the conclusions in the Draft EIS regarding spill risk or spill response.

3.9.2.2. *Non-Instantaneous Spills*

The three spill scenarios evaluated by Tesoro, as described in Draft EIS Section 13.5.3, Spill Scenarios and Regulatory Requirements, each describe an instantaneous spill. In an instantaneous spill event, the entire volume of the xylene or reformate would be released immediately to the environment. These release rates were considered to be worst-case compared to a gradual release of the same volume, whereby the contents of the xylene are more gradually released to the environment. During a gradual release scenario, there is a reduction in the concentrations of the material spilled (xylene or reformate) on the water surface and the material spilled that is dissolved in the water beneath the surface slick. In other words, if all the mass was released at once, the concentrations in the environment would reach a maximum. Although the impacts associated with a gradual release would naturally persist longer depending on the assumed duration of the release, the persistence estimated by the instantaneous release modeling indicated that concentrations return to sub-toxic levels within 24 to 36 hours. Assuming the gradual release scenario would likely last less than a day before the release was noticed and halted, the increased duration would result in a less concentrated injury lasting 36 to 48 hours. The overall conclusion of the impact assessment would be the same as those presented in the Draft EIS, since the instantaneous spill event has already accounted for potential exposure to higher, or worst-case, concentrations of the spilled material. A gradual release scenario would also afford responders a greater chance to stop or better contain the spill than from an instantaneous release, thereby potentially reducing the total amount released.

3.9.2.3. *Adverse Weather Conditions*

Modeling was performed to simulate the trajectory or dispersal of spilled material for three different wind conditions: winter, summer, and an annual average. Adverse weather conditions were considered and tested in GNOME for the analysis. “Adverse weather conditions” imply conditions during a storm event, with corresponding high wind speeds over 25 miles per hour (mph) and corresponding conditions such as precipitation and heavy wave action. Several test simulations of spill releases under high wind speed conditions were examined during the development of the Draft EIS prior to Tesoro performing the modeling exercise. It was determined from examination of these test runs that adverse conditions greatly reduced the impact from the spills due to the close proximity of shorelines at the dock and throughout the ship channel in the Salish Sea. The presence of adverse weather conditions/high wind speeds rapidly directed the spill onto only a narrow length of shoreline locations and greatly reduced the potential distribution and associated impacts to both the water surface and shorelines affected by contact with the spill. High wind speeds would also accelerate the process of evaporation, the primary process by which the mixed xylenes and reformate would be removed from the aquatic and terrestrial environments. The no-wind scenario was also considered but it was determined that the absence of any wind reduced the motion of the spill trajectory, and thereby also reduced the amount of shorelines and water surface locations contacted by the spill, so this scenario may underestimate the distribution of xylene or reformate in the event of a spill. Worst cases (with respect to the total area affected by a spill event) were observed with some wind speeds, specifically in instances where the winds provided motion to carry a spill further than it would be

carried by the currents and dispersion alone, and with some wind direction variability that resulted in the spreading the spill into a variety of locations, without limiting the trajectory to a narrow range of areas associated with strong winds. Therefore, the modeling results presented in the Draft EIS, Chapter 13, Marine Transportation, have greater potential impacts than would be expected under more adverse weather condition scenarios and are still considered to be a conservative approach to assessing potential impacts.

3.9.2.4. *Spill Modeling Uncertainties*

Commenters requested quantitative modeling and analysis to further characterize uncertainties. The GNOME model provides a means to characterize uncertainty in predictions by calculation of a “Minimum Regret Solution” trajectory. NOAA’s GNOME user’s manual (NOAA 2002) describes the Minimum Regret Solution trajectory as an area in which there is “a roughly 90 percent probability that the spilled oil will not extend beyond.” The modeler provides an Uncertainty Value to adjust the degree of randomness in the Minimum Regret Solution; the larger the value, the greater the amount of randomness. Output of the Minimum Regret Solution trajectory was provided by Tesoro’s spill modeling report (see Appendix G of the spill modeling report provided in Draft EIS Appendix 13-A, Fate and Behavior Analysis in the Marine Environment: Reformate and Mixed Xylenes) where estimated “best guess” spill trajectory locations (black dots) are plotted with the Minimum Regret Solution trajectory locations (red dots) such that 90 percent of the spilled material would be contained within the spilled trajectory location area.

However, care should be taken when interpreting GNOME’s uncertainty output. If interpreted literally, it could over-represent the potential extent of a spill event. The uncertainty feature is typically used by spill responders to add “noise” to the model output, extending the size or area of the trajectory predictions (or the area of the spill) to include a larger region of possible locations where the spill might travel considering, for example, that the forecasted winds may be 5 mph from the north when in fact they will be 7 mph from the northeast. To help responders prepare for possible locations where a spill may reach land, the uncertainty analysis offers a margin of safety. For simulations intended to estimate the actual size of a spill, this uncertainty estimator feature can be misconstrued to imply that a given spill event would cover a larger area than might occur in a real-world spill event. For example, a spill trajectory prediction may show a 1-mile wide region or area affected by a spill event. Application of a “95 percent Uncertainty Value” would add an additional 0.25 miles to the east and 0.25 miles to the west to indicate that theoretically, there is a 95 percent likelihood that the actual spill may travel somewhere within the 1.5 mile zone. There is a 90 percent likelihood that this 95 percent uncertainty Minimum Regret Solution region is accurate. However, the modeled results are not meant to imply that the actual event would spread a total of 1.5 miles. Interpreting the results in this manner could result in conservative estimates of the area potentially affected by a spill event. This approach was taken in the Draft EIS, and consequently, the modeled results are expected to be conservative.

The uncertainty analysis is also inherently limited in its inability to produce results in terms of thickness. The thickness analysis clarifies the impact assessment by filtering the output to remove modeled estimates of mass that are small beyond a safe threshold of being capable of causing injury.

Inclusion of the region of uncertainty would imply an area at risk of injury larger than the actual spill size would be, and potentially inclusive of spilled mass too small to be meaningful to an injury. Although the uncertainty analysis would illustrate potential locations where the actual spill location would be shifted, indicating the spill area may contact somewhat more or less water surface and shorelines, the overall conclusions of the spill impacts would be the same. Consequently, additional quantitative modeling and analysis to further characterize uncertainties would not change findings presented in the Draft EIS.

3.9.2.5. Estimation of Spill Thickness

The model results from GNOME provide output in the form of “spots”—which are dots that represent the spatial distribution of the spilled mass. Each spot represents the same amount of mass or amount of spilled material. The interpretation of the model output for the assessment of potential adverse effects on birds and marine wildlife contacting the surface slick is overly conservative if one does not account for the spill thickness floating on the water surface. GNOME output can display the apparent presence of a spill through spot diagrams, even when the mass per unit area could result in a slick so thin as to cause negligible effects, and correspondingly no impact. Therefore a thickness threshold was applied using the GNOME Analyst tool to generate contours representing locations where the spilled materials would have enough mass to be visible, yet below injury criteria. These contours can then be used to represent both visible and above injury threshold criteria.

While the thickness threshold application removes the overly conservative nature of the GNOME analysis, the threshold criteria selected were still considered conservative since the values were derived from oil spills with thick viscous oils. The threshold criteria for xylene or reformate would not be expected to be the same as what the modeling results indicate; therefore, the modeling results likely depict a larger area where xylene or reformate thickness would exceed injury threshold criteria. Thresholds that would be more representative of xylene or reformate were not available in published research; instead, published research on thickness thresholds focused on impacts of heavy oils was used for the GNOME analysis. However, these studies focus on the impacts that heavy oils have on feather structure, which affects a bird’s ability to regulate its body temperature. Lighter hydrocarbons like mixed xylenes and reformate will not behave like a viscous heavy oil in this manner. While xylene and reformate still can carry a risk of being ingested by birds preening their feathers or mammals cleaning their fur, it is expected that the animals would need to be exposed to higher concentrations to reach a risk threshold compared to scenarios where risk thresholds would be reached through dermal exposure (i.e., through situations where birds feathers are exposed to the heavy oils).

The GNOME Analyst tool converts the GNOME model's output of "best estimate" spot locations at selected times into contours of oil density (i.e., thickness) by algorithms that examine the spatial distribution of the spots. The sum of the spots' mass is divided over a designated area of water (mass per unit area) and then is divided by the chemical density (mass per volume), resulting in thickness. Although gasoline was used as a surrogate chemical within the GNOME modeling performed by Tesoro (an assumption that primarily functions to allow a rapid evaporation close to xylene), the densities of mixed xylenes and reformate (and not gasoline) were used for the GNOME Analyst thickness calculations.

In summary, inclusion of the thickness thresholds improves the estimation of the areas impacted by spills of mixed xylenes and reformate, but does so in a conservative manner.

3.9.2.6. *Estimation of Dissolved Concentrations*

Mixed xylenes (including monoaromatic compounds like ethylbenzene) are well documented as compounds that do not easily dissolve in water, and the fraction that does solubilize does not persist in surface waters for more than a few days due to its tendency to evaporate readily. Sources that corroborate these properties include the Agency for Toxic Substances and Disease Registry (ATSDR 2017), the National Institute for Occupational Safety and Health (NIOSH 2017), Occupational Safety and Health Administration (OSHA 2017), and the USEPA (USEPA 2017).

There are few historical large xylene spills to use for reference. One occurred in the U.S. on the Mississippi River on April 25, 2003. The M/V Bow Lion released approximately 42,000 gallons of xylene close to 2:00 AM. But by 10:00 AM, eight hours later, all values were below detection limits (NOAA 2003).

Complex three-dimensional modeling could be performed to re-examine the spills dissolution into the water column. However, such an effort would most likely arrive at the same conclusion for the assessment of impacts proposed in the Draft EIS: though there is low solubility in the chemicals examined, the high-volume spills would likely generate high concentrations at or close to the solubility limit in the top 1 to 3 meters of the water column. This plume of high concentrations is unlikely to persist for more than a few days before volatilization removes it from the water column into the air, where it will ultimately degrade. With concentrations likely above the threshold concentrations for aquatic organisms during this time, the extra precision of advanced complex modeling would rely on evaporation algorithms similar if not identical to those used in ADIOS2, resulting in the same determination for the duration of the aquatic exposure. Therefore, additional quantitative modeling is not recommended.

3.9.3. Spill Likelihood

The Draft EIS used Ecology's VTRA (Merrick and Van Dorp 2017) as part of the analysis assessing the likelihood of an increased spill risk due to the proposed project. The Draft EIS relied on the Draft VTRA; a subsequent review of the Final VTRA found no changes in the VTRA data and analysis cited in the Draft EIS. The VTRA report did not specifically address the proposed project, but did look at a number of future scenarios based on potential general

increases in vessel traffic from multiple potential sources. The proposed project's vessel traffic increase of 2.2 percent of all vessels upon Puget Sound's vessel traffic annually was compared to the spill likelihood predictions in the VTRA report based on the VTRA's future traffic scenarios. The proposed project's increase in vessels does not represent a significant increase in spill risk above the spill risks currently present. These risks are further minimized by improved traffic flow mentioned in the Draft EIS. This is consistent with the conclusions of the VTRA based on information provided for the scenarios that were analyzed. The clarification that the VTRA did not specifically analyze the proposed project's scenario also applies to the cumulative impacts of the overall increased risk of a spill in the Salish Sea (see Draft EIS Section 13.6, Cumulative Impacts from Marine Transportation). The cumulative impact analysis outlined in the VTRA therefore depicts an accurate assessment of spill risk associated with the scenarios outline in the proposed project.

3.9.4. Spill Response

Commenters requested additional information on how the USCG and USEPA ensure that vessels are following the regulations and activities required for spill response once a vessel leaves the refinery wharf. There are substantial regulatory requirements dealing with spill response readiness and equipment required by MARPOL and the CWA as amended by OPA 90 and CERCLA. The details of the USCG and USEPA requirements are specified in 33 CFR 154 Subpart F and 40 CFR 112 Subpart D; these regulations are described in Draft EIS Table 13-1. These requirements are regularly checked by USCG and USEPA compliance inspections. The following is a brief summary of some of these requirements:

- Tesoro must maintain approved Facility Response Contingency Plans designed to have under contract oil spill response organizations with resources and equipment designed to respond and clean up a worst-case scenario discharge.
- Each tank vessel and ATB must maintain a USCG approved Vessel Response Contingency Plan designed to have under contract oil spill response organizations (OSROs) with resources and equipment designed to respond and clean up a worst-case scenario discharge.
- Tesoro, tank vessels, and ATBs must maintain a triennial oil spill readiness and preparedness training program composed of quarterly drills and annual large-scale exercises designed to regularly mobilize spill response equipment and test and train Tesoro, vessel, and contracted spill responders.
- Tesoro must have immediately deployed spill containment boom surrounding the vessel.
- Tesoro must have immediately available additional spill containment and spill removal equipment staged near Tesoro that can be deployed by trained personnel within one hour of discharge.
- Tesoro, tank vessels, and ATBs must have USCG-approved xylene transfer procedures controlled by specially trained "persons in charge" (PIC) of vessel and facility dock transfer operations.

- Tesoro must perform tests on emergency shut down equipment using the specified shut down procedures before beginning any transfer of xylene.
- Tesoro and tank vessel PICs must make a mandatory pre-briefed transfer conference between the vessel PIC and facility PIC using a USCG-approved oil spill prevention mitigation checklist coordinating the specifics of each transfer. This checklist is called a Declaration of Inspection.
- Tesoro and tank vessel personnel must provide immediate small volume fixed containment areas around the transfer connection areas on both the vessel and facility.
- Tesoro must annually hydrostatically test all hoses and transfer piping to 1.5 times the maximum allowable working pressure allowed for those hoses and piping.
- Tesoro and ATBs must check before each transfer the interface of installed facility/vessel overfill alarms that activate at 90 percent of the capacity of the vessel tank. At a 95 percent tank capacity, a second alarm is required that also automatically shuts down Tesoro's transfer equipment.
- Tesoro must have each transfer pressure sensor, pressure and vacuum relief valve annually checked and certified.
- Tesoro must have in their approved Facility Response Contingency Plan specific pre-planned spill response strategies designed to protect those geographic areas around Tesoro that may be impacted by the facility's worst-case-scenario discharge. These critical protection areas that include public water intake locations, endangered species of plants and wildlife, and critical shorelines to protect are identified by the Federal Oil Spill Area Contingency Plan.
- Tesoro may only contract as a spill responder with USCG-certified oil spill response organizations that are rated to respond to the worst-case-scenario discharge.
- Tesoro contracted oil spill responders must have special Occupational Safety and Health Administration emergency response operations training designated in 29 CFR 1910.

For further information on other requirements, please refer to 33 CFR 154 Subpart F and 40 CFR 112 Subpart D.

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4. MITIGATION

The proposed project was designed to minimize many potential impacts and includes best management practices (such as pollution prevention plans to protect surface water during construction) to avoid or minimize impacts. These designs and control features were included in Draft EIS Table ES-2 and are noted in the “Key Planned Prevention and Minimization Measures from Draft EIS” column in Table 8 below. For two resources, air quality and climate change and cultural resources, additional mitigation measures and voluntary commitments by Tesoro have been included in this Final EIS and provided in the “Additional Proposed Mitigations Measures” column.

Table 8: Proposed Mitigation Measures

Resource	Key Planned Prevention and Minimization Measures from Draft EIS ^a	Additional Proposed Mitigation Measures from Final EIS
<i>Draft EIS Chapter 3, Geologic Resources</i>		
Geologic Resources	Implementation of appropriate erosion control best management practices in accordance with permitting requirements would keep soil within construction boundaries, such as covering stockpiled soils, setting clearing limits, and installing temporary silt barriers around construction areas. Measures to promote slope stability, particularly in the New Tanks Area, would be implemented including stabilizing steep slopes with asphalt binder or temporary seeding and following applicable grading and building requirements. Exposed soil surfaces and unprotected steep slopes would be stabilized by paving or seeding surfaces following construction activities.	None
<i>Draft EIS Chapter 4, Air Quality and Climate Change</i>		
Air Quality and Climate Change	<p>BACT selections for the new boiler were ultra-low NO_x burners with Selective Catalytic Reduction to minimize nitrogen oxides emissions, Catalytic Oxidizer to minimize carbon monoxide and volatile organic compounds emissions, and the use of natural gas or treated fuel gas as a fuel and good combustion technology to minimize GHG and sulfur dioxide emissions.</p> <p>The Marine Vapor Emission Control System is being installed as BACT to minimize volatile organic compounds emissions from loading and unloading vessels at the refinery wharf. The technology selected minimizes the formation of NO_x emissions, and the use of natural gas as a fuel and good combustion technology to minimize GHG, carbon monoxide, and sulfur dioxide emissions.</p> <p>The new storage tanks have BACT selected as dual seal floating roofs to minimize volatile organic compounds emissions.</p> <p>For new piping and pump components, the BACT selected is low emission rate leak detection and repair.</p>	Implement GHG voluntary commitment negotiated among NWCAA, Ecology, and Skagit County
<i>Draft EIS Chapter 5, Freshwater Resources</i>		
Freshwater Resources (surface water, groundwater, and wetlands)	Stormwater during construction would be managed in accordance with the construction SWPPP and TESC Plan. Drainage ditches would be designed to guard against erosion. Stormwater and wastewater within developed areas would be routed to the on-site WWTP, preventing sediment or spilled materials from reaching freshwater resources, in accordance with NPDES permit. Tanks will have containment berms around them able to contain the entire contents of the tank in the event of a leak or breach. Regular inspections of piping, tanks, and tank containment infrastructure would occur. Proposed project components were designed to be outside of floodplain areas.	None

Resource	Key Planned Prevention and Minimization Measures from Draft EIS ^a	Additional Proposed Mitigation Measures from Final EIS
<i>Draft EIS Chapter 6, Terrestrial Vegetation and Wildlife</i>		
Terrestrial Vegetation and Wildlife	Implementation of a Weed Management Plan with direction from the Skagit County Noxious Weed Control Board; dust reduction measures such as wetting and covering exposed soil; and approved work windows for in-water work to reduce impacts on important prey species of marine birds; implementation of fire control measures.	None
<i>Draft EIS Chapter 7, Marine and Nearshore Resources</i>		
Marine and Nearshore Resources	Construction: Work at the refinery wharf and causeway would take place in approved fish window to minimize disruption to spawning fish. Operations: Stormwater and wastewater discharged at approved outfalls in accordance with NPDES permit requirement, a survey for the presence of surf smelt eggs adjacent to the wharf and causeway prior to beginning construction and adherence to work windows if discovered, directing ballast water from marine vessels to the WWTP for treatment prior to discharge.	None
<i>Draft EIS Chapter 9, Environmental Health</i>		
Energy and Natural Resources	The high-efficiency boiler would utilize energy conservation features to maximize energy recovery and minimize natural gas consumption, such as combustion air pre-heat and feedwater pre-heat.	None
Air Emissions	Prevention/mitigation measures to reduce air emissions are listed under air quality.	None
Traffic Safety	Truck traffic would use roads designated for truck use by the city of Anacortes. Actions to ensure safety during SPMT hauls include: Transport permits would be required from the city of Anacortes and Skagit County and a Superload Transport Permit would be required from the WSDOT for the SPMT heavy haul moves from the Port of Anacortes to the refinery. Moves of prefabricated proposed project components would travel at slow speeds and moves are planned to occur at night to minimize disruptions along the marine vessel transportation route.	None
Noise	Mufflers will be installed on construction equipment.	None
<i>Draft EIS Chapter 10, Land and Shoreline Use</i>		
Land Use	Tesoro maintains 100-yard public safety and security exclusion zone around the refinery wharf and causeway, implementation of vessel traffic and safety measures described below.	None
Recreation	Use of materials and paint for the proposed project infrastructure with characteristics (i.e., color and texture) similar to that of existing refinery infrastructure, to reduce contrast between new and existing structures.	None
Visual/ Aesthetics	New lighting for the proposed project would match the existing type of the lighting at the refinery, which would reduce contrast between existing and new lighting during nighttime hours. Directional lighting techniques and shrouds would be used to minimize light overcasting and glare.	None

Resource	Key Planned Prevention and Minimization Measures from Draft EIS ^a	Additional Proposed Mitigation Measures from Final EIS
<i>Draft EIS Chapter 11, Social and Economic Environment</i>		
Housing	None	None
Public Services	Tesoro's own, on-site firefighting resources and mutual aid agreements with industrial neighbors.	None
Economics	Federal Regulation OPA 90 requires a party deemed responsible for releasing oil into navigable waters of the U.S. to incur the costs of its removal and provide compensation for associated damages (33 United States Code § 2702).	None
<i>Draft EIS Chapter 12, Cultural Resources</i>		
Cultural Resources	Implementation of the Unanticipated Discoveries Plan during construction.	<p>Implementation of additional archaeological survey once native soils have been reached in the New Tanks Area to identify potential buried surfaces, archaeological materials, features such as hearths, or strata that may contain cultural materials. The Swinomish Indian Tribal Community would have the option of providing a tribal archeologist to perform monitoring during construction.</p> <p>Voluntary commitment to donate up to three spill response equipment trailers to Swinomish Indian Tribal Community, Suquamish Tribe, and Tulalip Tribes. It is envisioned that each tribe will manage their own response trailer and Tesoro will provide training on deployment strategies.</p>

Resource	Key Planned Prevention and Minimization Measures from Draft EIS ^a	Additional Proposed Mitigation Measures from Final EIS
		Tesoro will also provide training to the tribes on the most accurate methods for monitoring vessel traffic between Neah Bay and the Tesoro Anacortes Refinery.
<i>Draft EIS Chapter 13, Marine Transportation</i>		
Vessel Traffic and Safety	Use of tug escorts and licensed pilots within the study area; use of traffic separation schemes; use of safety zones that restrict or prohibit vessel traffic in sensitive areas; specific tank ship security zones where a 500-yard zone in all directions is established around a tank ship (whether stationary or moving). Use of vessel designed with multiple independent cargo oil tanks rather than one single large tank, double hulls, and modern navigation systems.	None
Marine Spills	Spill prevention measures include a robust wharf management program to address transfer operations at the refinery wharf to help prevent spills. Implementation of the Dock Manual, SPCC plan, and OSCP. Annual updates (at a minimum) to the OSCP. The OSCP plan is written in conjunction with other plans including the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR 300), the Northwest Area Contingency Plan (NWAC 2017/Region 10 RRT), and the Washington Statewide Master Oil and Hazardous Substance Spill Contingency Plan (RCW 90.56).	None

BACT = Best Available Control Technology; EIS = Environmental Impact Statement; GHG = greenhouse gases; NOx = nitrogen oxides; NPDES = National Pollutant Discharge Elimination System; OPA 90 = Oil Pollution Act of 1990; OSCP = Oil Spill Contingency Plan; SPCC = Spill Prevention, Control, and Countermeasures; SPMT = self-propelled modular transporter; SWPPP = Stormwater Pollution Prevention Plan; TESC = temporary erosion and sediment control; WSDOT = Washington State Department of Transportation; WWTP = Wastewater Treatment Plant

^a The controls listed that apply to marine vessel transportation are not specific to the proposed project, but are regulatory requirements that apply to all vessel traffic in the marine vessel transportation study area.

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5. DISTRIBUTION LIST

The Final EIS was issued on July 10, 2017. This chapter describes how interested parties and those who commented on the Draft EIS were notified of its availability, and provides information about how they may access the Final EIS.

The applicant, Tesoro Refining & Marketing Company LLC, Department of Ecology, and the lead agency received printed copies of the Final EIS. The following people were notified of the availability of the Final EIS via email:

- Agencies, tribes, and organizations who were on the distribution list for the Draft EIS (see Draft EIS Section 15.1, Table – Draft Notification List)
- Individuals who provided their email address prior to the release of the Final EIS
- Individuals on Skagit County’s mailing list

Individuals who only provided a mailing address (with no email address) were sent a post card notifying of the Final EIS. Individuals who commented on the Draft EIS, but did not provide an email or mailing address were not notified. These comments and responses can be found in Appendix A, Draft EIS Comments and Responses.

Printed copies of the Final EIS were made available at the same public reading rooms used for the Draft EIS. Draft EIS Section 15.2, Public Reading Rooms, provides a list of the public reading room locations.

The Final EIS is available for download at the project website: <http://TesoroAnacortesEIS.com>. To obtain a printed copy or a USB drive with an electronic copy of the Final EIS (for the cost of production and shipping), follow the instructions provided at <http://TesoroAnacortesEIS.com>

To request materials in alternate formats, follow the instructions at <http://TesoroAnacortesEIS.com>.

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Appendix A

Draft EIS Comments and Responses

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APPENDIX A: DRAFT EIS COMMENTS AND RESPONSES

All comments received during the comment period were reviewed and analyzed to identify substantive comments on the Draft EIS. Each substantive comment is responded to in the tables below. To find your comment:

1. Look up your name in the Commenter Index
2. Note your Comment IDs in the right column
3. Search the left columns of the Comment Response Tables for your Comment IDs
 - Comments IDs starting with “Ch” are found in the Chapter tables
 - Comment IDs starting with “Other” are found in the “Other Comments” table
 - Comment IDs starting with “Form” are found in Form Submissions table

The comments included in this chapter were copied verbatim from the original communication (e.g., letter, email, or transcribed voicemail or testimony). Original comments were not edited or altered in any way, and any typographical errors or other irregularities shown in the tables below were included as part of the original communication.

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Chapter 1: Introduction

ID	Contact	Comment Text	Response
Ch01-001	Susan E Ostrowski	As the wife of an employee at Tesoro March Point refinery who is personally involved in the development of this project. I would like to express my appreciation and support for the comprehensive Draft EIS that was completed by the County Planning Department employees and contractors.	Thank you for your comment.
Ch01-002	Tara Havard	After reviewing the Draft Environmental Impact Statement (DEIS) for the CPUP, I believe it is a comprehensive evaluation of the proposed project. It is SOLID!	Thank you for your comment.
Ch01-003	Dave Popoff	Thank you for conducting an Environmental Impact Statement (EIS) on the proposed "Clean Products Upgrade (CPU) Project" at the Tesoro Refinery in Anacortes. I am concerned about the likelihood of significant adverse environmental impacts regarding this proposal and support a detailed review of this project.	One of the purposes of the EIS is to conduct a thorough review of the potential impacts related to the proposed project.
Ch01-004	David Wilson	After reviewing the Draft Environmental Impact Statement (DEIS) for the CPUP, I believe it is a comprehensive evaluation of the proposed project.	Thank you for your comment.
Ch01-005	Joseph Stivala	Again I ask the county of Skagit, where I reside, to be a community member. Review the EIS, listen to our families in the community, and do what is most beneficial for the environment and our community, so that our next generation will have the same benefits we enjoy today.	Thank you for your comment.
Ch01-006	Terry Brazas	I believe the DEIS is comprehensive and adequately considers all of the issues relevant to me and the community.	Thank you for your comment.
Ch01-007	Sarah LaVoy	I believe the DEIS is a comprehensive review and addresses all the issues relevant to our community. I greatly appreciate the time the county put into creating this document for the public.	Thank you for your comment.
Ch01-008	Matthew Williams	I believe the DEIS is comprehensive and adequately takes into	Thank you for your comment.

ID	Contact	Comment Text	Response
		consideration issues relevant to our community.	
Ch01-009	Rebecca Spurling	I believe the draft EIS is comprehensive and adequately considers all of the issues relevant to me and the community. However it would be good for the EIS to clearly state the benefit of the MVEC, so that the decision-makers are more fully aware that the Clean Products Upgrade Project has been designed to include investments that bring value to our community.	The MVEC System would be used to control volatile hydrocarbon emissions from marine transfer operations. Section 2.6.4 of the Draft EIS discusses the MVEC System. Section 4.4.2 of the Draft EIS discusses the potential impacts and benefits of the MVEC system on air quality.
Ch01-010	Sarah Hammock	The draft EIS is comprehensive and considers all issues relevant to our community.	Thank you for your comment.
Ch01-011	Philo Wallis Lund	I am sure you guys are doing the best you can do and I am hopeful you will continue to treat our area and environment as the treasure (tesoro) that it is.	Thank you for your comment.
Ch01-012	Gordon Bruchner	I believe that the EIS related to Tesoros plans to extract xylene from the crude oil is complete and proper.	Thank you for your comment.
Ch01-013	Conor Keeney	I made a comment at the open house last night but realized that I didn't get a chance to thank Skagit County and the EIS team for all the work they have put into the process up until this point. I know from experience how difficult it can be to guide this process and just wanted to make sure you knew I appreciate your hard work.	Thank you for your comment.
Ch01-014	Anne Elkins	<p>GENERAL METHODOLOGY:</p> <p>I find it disturbing that "Less than Significant" was selected for every single item except possible spills on each fact sheet. I don't think "Less than Significant" / "Potentially Significant" is the correct scoring system to use. It's not a black/white, on/off, digital choice. It is an analog scale. Surely some of these items would have fallen within a middle category of "Moderate Significance" if that choice had been provided. But perhaps the scale was designed to aid in rubber stamping this project?</p> <p>I also find the name of this project "Clean Products Upgrade Project" to be prejudicial and deliberately misleading. Again,</p>	<p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B of the Draft EIS and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant.</p> <p>The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.</p>

ID	Contact	Comment Text	Response
		making it easier to rubber stamp?	
Ch01-015	James Tangaro	I have reviewed Skagit County's draft EIS and believe it to be more than adequate in covering potential impacts from Tesoro's CPUP. However, I don't think the positive impact from the marine vapor recovery unit is highlighted enough.	Thank you for your comment.
Ch01-016	James Tangaro	I also attended the public hearing and listened to the comments. A large number of the opposing comments were around fossil fuels in general, the refinery as a whole, and crude oil delivered by rail. I urge the County staff to be strict when responding to comments. The refinery is not the subject of the draft EIS, nor is crude by rail. CPUP does not impact how the refinery receives crude nor does it increase the refinery's crude capacity. I understand some people have emotional responses around those issues, but they are not relevant to the draft EIS or CPUP.	Thank you for your comment.
Ch01-017	Tom Boland	We recognize the need to completely review these improvements and to get the community involved with the process. Thank you for your due diligence and your review of this process and we voice our support of Tesoro's Clean Product Upgrade Project.	Thank you for your comment.
Ch01-018	Edward John McLeod	In looking through many of the previous comments to this EIS it is clear that Tesoro has strongly recommended that it's employees and service providers submit comments supporting the Xylene project which is understandable.	Thank you for your comment.
Ch01-019	Richard Johnson	I have been very concerned over the adverse publicity surrounding the TESORO upgrade project. My concerns are based on the emotional arguments that those in opposition resort to. Facts don't matter only opinion and distortions are the currency of the opposition's argument. As an engineer and active community volunteer I find these tactics appalling. I find the facts as put forth in the Environmental Impact Statement to be rational and surprisingly thorough.	Thank you for your comment.
Ch01-020	Anne Cox	I am more concerned now than before reading the potential impacts which seem to imply there is NO DANGER. Hard to believe	The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an

ID	Contact	Comment Text	Response
		this is thorough.	evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B of the Draft EIS and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant.
Ch01-021	Stephanie Hamilton	I reviewed the Draft EIS prepared by the county and would like to commend all those involved for preparing such a complete and comprehensive report for the community to review. I believe the report adequately addresses and examines all the potential impacts of this project to the local environment.	Thank you for your comment.
Ch01-022	Town of La Conner	<p>A RESOLUTION PROVIDING COMMENTS TO THE TESORO EIS</p> <p>Whereas, the Town of La Conner is connected to the work of the Tesoro refinery. Our community includes many who work at the valley refineries as well as those who support the work there in some capacity; and,</p> <p>Whereas, the health and safety of our community members is a high priority; and,</p> <p>Whereas, La Conner's proximity to the refinery leaves the Town vulnerable to the environmental impacts of the proposed project; and,</p> <p>Whereas, the Draft Environmental Impact Statement (DEIS) should establish high standards of care in monitoring and addressing risks of exposure to xylene for their workers as well as with managing risks in the event of community and environmental exposure with a tanker spill incident or an accident with air release of xylene; and,</p> <p>Whereas, the new xylene processing facility and the transportation issues relating material supply and product transport have separate unrelated impacts.</p>	<p>The Draft EIS discusses the potential impacts of the proposed project, including the production of xylene at the refinery and the transportation of products to and from the Tesoro refinery. The proposed project includes the transport of xylenes and reformate using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). The transport of sulfolane, ammonia, and perchloroethylene to the refinery via truck is described in Section 2.8.1 of the Draft EIS.</p> <p>Potential impacts from transportation (vessels and vehicles) during construction and operation of the proposed project are discussed throughout the EIS.</p> <p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's</p>

ID	Contact	Comment Text	Response
		<p>NOW, THEREFORE BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF LA CONNER REQUESTS THE FOLLOWING COMMENTS BE ENTERED INTO THE DEIS RECORD:</p> <p>Section 1: Separate DE IS Processes- The Town Council requests Tesoro to undertake separate DE IS processes for the new xylene production facility and product transportation. The transportation assessment should include all methods (marine vessel, rail and truck tankers) used to move product into and out of the Tesoro facility.</p>	<p>objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786).</p> <p>Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch01-023	Carol Thibeau	<p>EIS draft did not include; Data from San Juan County</p>	<p>The Draft EIS includes data on San Juan County and discusses the potential impacts of the proposed project on resources in San Juan County in the following chapters:</p> <ul style="list-style-type: none"> • Air quality and climate change – Chapter 4 • Terrestrial vegetation and wildlife – Chapter 6 • Marine and nearshore resources – Chapter 7 • Land use and shoreline use – Chapter 10 • Social and economic environment – Chapter 11 • Marine transportation – Chapter 13
Ch01-024	Tom Hess	<p>The draft environmental impact statement gives a comprehensive review of the potential impacts of the project and includes adequate mitigations.</p> <p>While more emphasis could be given to the many positive aspects of this project, I believe this document provides a complete analysis of the project.</p>	<p>The purpose of the EIS is to provide discussion of potential significant environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality. However, in accordance with SEPA Rules, beneficial environmental impacts may be discussed (see WAC 197-11-400 and 402). The Draft EIS discusses the economic benefits of the proposed project within the study area in Sections 11.5.2 and 11.6.2.</p>
Ch01-025	Eddy Ury	<p>I'm ...with RE Sources for Sustainable Communities based in Bellingham, and we advocate to protect the health of the Northwest Washington's peoples and ecosystems. And thank you all for considering public input with this Draft EIS. Our role as a civil society here is to hold agencies accountable and challenge you to the highest possible standards. And, you know, even with a -- really a good draft, there's always room for improvement. And we also help to educate people in these public processes, so they can</p>	<p>Thank you for your comment.</p>

ID	Contact	Comment Text	Response
		participate	
Ch01-026	Bryce Oxford	<p>I believe the Draft Environmental Impact Statement provides a complete and comprehensive examination of all the potential impacts to the local environment and I urge you to release the Final Environmental Impact Statement as soon as possible.</p> <p>While the potential impacts to the environment and local resources are clearly described along with the planned prevention and mitigation measures, the positive aspects of the project don't appear to be as prominently presented. Although mitigation isn't necessary for the positive impacts, I believe they are important and should be considered.</p>	<p>The purpose of the EIS is to provide discussion of potential significant environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality. However, in accordance with SEPA Rules, beneficial environmental impacts may be discussed (see WAC 197-11-400 and 402). The Draft EIS discusses the economic benefits of the proposed project within the study area in Sections 11.5.2 and 11.6.2.</p>
Ch01-027	Bryan Potter	<p>The EIS addresses several concerning issues but only in a cursory manner. Increased marine traffic, truck traffic, construction, production, and hazardous waste materials including vapors are all summarily dismissed as posing no significant impact. However, no data or credible sources are provided to support those conclusions.</p>	<p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B of the Draft EIS and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant.</p> <p>The Draft EIS discusses the potential impacts of the proposed project, and the data used to support these analyses, in the following sections:</p> <ul style="list-style-type: none"> • Marine traffic – Section 13.3.2 • Truck traffic – Section 9.4.2 • Hazardous materials and vapors – Sections 4.4, 9.3, 9.6, and 13.5 <p>References are provided at the end of the chapters.</p>
Ch01-028	Jane Alynn	<p>A project of this scope with a chemical this toxic should not be pushed through without much more due process.</p>	<p>One of the purposes of the EIS is to conduct a thorough review of the potential impacts related to the proposed project. Skagit County, as the lead agency, is overseeing the preparation of this EIS and is ensuring that applicable regulations and requirements</p>

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			under SEPA are followed, including an analysis of the impacts associated with the manufacture and shipment of xylene. A list of required permits for the proposed project is provided in Table 1-1 in Section 1.4.5 of the Draft EIS.
Ch01-029	Anne Miller	But, in general, I just think that the final impact assessment needs to be a lot more clear and defined.	Thank you for your comment.
Ch01-030	Mike Culley	I like to thank the county for preparing a comprehensive and complete EIS.	Thank you for your comment.
Ch01-031	Marylee Chamberlain	It's a big project. It requires mitigation, transportation, management, and lots and lots of deep review with the highest possible standards considered at every possible phase of this project.	Thank you for your comment.
Ch01-032	Sue O'Donnell	Thank you for your careful consideration of the issues. You and your families all live here too. Let's work toward reducing pollution, not increasing it.	Thank you for your comment.
Ch01-033	Julia Sutter	I really want to focus on the two planning councils -- or council members. Let's slow it down. Let's not make a rush to judgment. Let's take the time to really delve into these questions that people have. And to the Tesoro people that are here, actually you're saying that you want to hear the community. Well, the only people that I've heard that have been pro -- for this have been actually workers at that plant. The community is saying, "Wait a minute here." So if you really do know -- do want to hear the community, hear us. Slow down. Take the time to do these in-depth -- answer these in-depth questions. Come up with new ideas. We can solve this together. And it's not just about money, and it's not just about plastic. We're smarter than that. So, thank you very much.	Thank you for your comment.
Ch01-034	Joanne Schoettler	We really do need a full environmental statement that includes everything	Thank you for your comment.
Ch01-035	Lin McJunkin	I attended one of the recent open forums held at the Anacortes	Thank you for your comment.

ID	Contact	Comment Text	Response
		High School about your company's xylene extraction project proposal. I appreciated the opportunity to read Tesoro's information and hear public comments	
Ch01-036	Pauline Druffel	I am grateful for the opportunity to leave my comment about the Tesoro Anacortes proposed Coal Export Terminal. Had there been a hearing again in Spokane I would have gone to it.	Thank you for your comment.
Ch01-037	Pam Springer	I would hope that our County Commissioners really study all the public input.	Thank you for your comment.
Ch01-038	Meredith Berlin	Thank you for your time and work on this. It is very hard for me as a citizen without training in the language used here to interpret the document. I spent several hours reading it, and honestly I am not sure how to respond.	Thank you for your comment.
Ch01-039	Sharon Levine	The draft EIS doesn't adequately address potential (negative) environmental impacts or propose acceptable mitigation.	Thank you for your comment.
Ch01-040	Arlene French	Thank you for letting us make comments easily.	Thank you for your comment.
Ch01-041	Julie Kinder	If I had a suggestion to make on the Draft EIS, it would be that I think the benefits are under-emphasized in terms of reducing sulfur and fuels in mitigating volatile organic compounds [unintelligible].	Additional information regarding the potential benefits of the proposed project with respect to air emissions (sulfur and VOCs) is provided in Section 3.3 of this Final EIS.
Ch01-042	Sigrid Asmus	Our environment and its livable future need to be protected from the unaccountable interests intent on exploiting it for unaccountable short-term private gain. I ask that the Board use its fullest authority to do a full EIS, and that every effort be made to require that our people, Tribes, fisheries, and future be protected from the unsustainable damage that the Tesoro project represents.	Thank you for your comment.
Ch01-043	Bob Raymond	The risk assessments of xylene production and transport should be as complete as the state of the art allows.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch01-044	Betsy Toll	The substance Tesoro proposes to manufacture and export, xylene, is a deadly substance, highly volatile, hazardous, and noxious. Tesoro has not demonstrated a compelling need for this deadly product other than its profitability.	Thank you for your comment.
Ch01-045	Betsy Toll	The DEIS does not include a thorough review of the safety requirements and full impacts of the project. That irresponsibility is a matter of great concern.	Thank you for your comment.
Ch01-046	Betsy Toll	I strongly urge you to send this project back to the drawing board until the applicant can clearly and carefully demonstrate that the environmental and human health and safety issues it raises can be rigorously controlled.	Thank you for your comment.
Ch01-047	Sandy Childs	The EIS draft is comprehensive and considers issues relevant to our area	Thank you for your comment.
Ch01-048	Bruce Rustad	I believe the draft EIS is comprehensive and considers all of the issues relevant to our community. I am proud to support this project and I believe it will bring many benefits to our community.	Thank you for your comment.
Ch01-049	Jim Ciecko	This proposal asks us to assume substantial new risks to our communities. I do not think these risks have been adequately looked at in this EIS.	Thank you for your comment.
Ch01-050	Sara Holahan	<p>Tesoro is asking permission to start a new production of a dangerous substance in order to pay for its legal obligation to make cleaner fuels (reducing the sulphur content). They also say this would make them more financially secure. The environmental impact should not be concerned with the financial situation. The county is not obligated to permit Tesoro to make huge profits at the expense of the health of our county.</p> <p>I find that the consulting company, ERM, has provided a very cursory study that consistently glosses over all impacts as “negligible” or “non significant”. It almost appears that they are working for the benefit of Tesoro. They have not considered how</p>	<p>The County is ultimately responsible for all analysis, content, description of potential impacts, mitigation requirements, and the decision with respect to the proposed project in accordance with SEPA. The Draft EIS scoping process, which included public input, identified the potential impacts to be analyzed (see Section 1.4 of the Draft EIS). The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable significant adverse environmental impacts. These guidelines were followed in preparing the Draft EIS. Comments were then received on the Draft EIS, which further informed development of this Final EIS. After consideration of the comments received, additional analysis</p>

ID	Contact	Comment Text	Response
		all these impacts add up as a whole.	was completed and included in this Final EIS.
Ch01-051	Suzanne Butler	All of the project’s impacts must be studied and verified independently. I’m concerned that the “expert” studies seem to be coming from companies related to the fossil fuel industry.	Thank you for your comment.
Ch01-052	Deborah Rudnick	The draft EIS is lacking critical information that would enable an accurate and realistic evaluation of the safety and risks of this proposal.	Thank you for your comment.
Ch01-053	Mary Manous	I urge Skagit County as lead agency for the EIS to ensure that all risks from the proposed xylene plant be thoroughly evaluated in the report upon which decisions about needed permits will be based.	Thank you for your comment.
Ch01-054	Deborah Rudnick	At a time when protecting the health of our sea and its people and wildlife has never been more critical, we cannot afford an EIS that does not do an accurate and complete job of evaluating the potential risks of exporting toxic materials from our shorelines. Thank you for your attention and interest in making sure this evaluation is thorough, transparent, and accurate with respect to its potential impacts and risks.	Thank you for your comment.
Ch01-055	Kathleen Lorence-Flanagan	2. Xylene is used for making plastic products, polyester clothing, and other synthetic products. Do we really need more plastic products clogging the oceans/beaches and landfills? It seems unconscionable. At a minimum the EIS must include assurances the production of xylene will not exceed amounts cited in the DEIS.	The proposed project description does not include expansion of the estimated xylene production of 15,000 bpd. Production of mixed xylenes in amounts greater than 15,000 bpd was not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Ch01-056	Skagit Audubon Society, Timothy Manns	6. The draft EIS takes pains to argue that a spill of reformate or mixed xylenes is highly unlikely, yet the potential catastrophic effects of a spill merit a rating of “significant”. On page ES-15 of the draft EIS Executive Summary there is a helpful side note explaining the definition of “significant” as used in discussing Significant Impacts under SEPA (the Washington State Environmental Protection Act). We note the following: “SEPA states: ‘The severity of an impact should be weighed along with	The Draft EIS analyzed the potential impacts to terrestrial species should a spill of xylenes or reformate occur in the marine environment and concluded that there was a potentially significant impact to these species. The Draft EIS discusses the toxicity of xylene and reformate in the marine environment in Section 6.4.3.3 and Table 6-9. Additional information regarding the toxicity of xylene and reformate to marine birds and aquatic life and the potential significance of impacts during a marine spill

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		<p>the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.” We are certain that no Tesoro employee wants a leak, spill, or other accident and that great pains are taken daily to avoid a repeat of the occurrences that both refineries at March Point have experienced. The fact is that the absence of major spills does not eliminate their potential to occur, and under circumstances that cannot be completely foreseen or controlled, the consequences of this rare event could be catastrophic for people and for the environment, including birds and other wildlife. It is, therefore, not valid to conclude with certainty, as the draft EIS does, that the potential effects on birds would be less than significant because the likelihood of a spill is very low.</p> <p>The final EIS must correct this conclusion.</p>	<p>is provided in Section 3.5.2 of this Final EIS.</p> <p>Overall risk to terrestrial species was determined to be less than significant in the event of a spill on land considering the context of the likelihood of a spill occurring, measures in place to prevent a spill, and the potential exposure to terrestrial animals in the event of a spill. The evaluation is presented in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Spill on land – Section 6.4.3.2 • Marine spill, including xylene toxicity to terrestrial wildlife –Section 6.4.3.3 <p>Contaminants are considered unlikely to bioaccumulate and are discussed with regard to state and federal threatened and endangered species in Section 6.5.2 of the Draft EIS.</p>
Ch01-057	Skagit Audubon Society, Timothy Manns	<p>Conclusion</p> <p>The final EIS must correct the deficiencies, contradictions, absence of studies, and reliance on obsolete information in the draft EIS that we have identified in this comment. It must also answer all the important questions we have raised.</p> <p>Thank you for the opportunity to offer comments on this significant project in our community. We appreciate that Skagit County required a full EIS as is appropriate for a project of this scale and potential impact.</p>	Thank you for your comment.
Ch01-058	Suquamish Tribe, Steve Todd	<p>Lastly, the DEIS is indicative of a lack of meaningful tribal consultation with affected treaty tribes and suggests a lack of understanding of the risks and impacts to treaty tribes arising from this project.</p>	<p>Tribes were invited to provide information to the EIS scoping process and the Draft EIS. See Section 1.4.4 of the Draft EIS for more information. In response to comments received, additional discussion of tribal resources has been included in Section 3.8 of this Final EIS.</p>
Ch01-059	Swinomish Indian Tribal Community, Larry Wasserman	<p>As you know, the Swinomish Tribe is a federally recognized tribe with a Reservation and Usual and Accustomed fishing areas reserved under the Treaty of Point Elliot of 1855. The Tribe registers a number of major concerns about this project, which involves the Tesoro wharf and upland refinery, within and adjacent</p>	Thank you for your comment.

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		<p>to the Tribe’s Usual and Accustomed fishing area and Reservation.</p> <p>With the available time and resources, it is not possible for us to comprehensively catalog all missing or incorrect elements in the DEIS. We therefore rely upon and incorporate by reference the concerns identified by other tribes and groups. Our substantive comments, identifying gaps in the DEIS are set out below, with comments related to vessel traffic, air quality and cultural resources, attached as the Appendix and incorporated herein by reference.</p>	
Ch01-060	Swinomish Indian Tribal Community, Larry Wasserman	<p>2. The County Should Issue an SEIS, Including a New Traffic Study, and Examine Other Alternatives.</p> <p>In this letter and Appendix, we emphasize our concerns with the inadequacies of the DEIS with respect to potential significant adverse impacts of this project on the health of Tribal members, our treaty secured fishing resources, the ecosystem and airshed of the Swinomish Reservation, important archeological and cultural resources, and our usual and accustomed fishing, hunting and gathering areas. Based on the inadequacies documented herein, the Tribe requests Skagit County to issue a supplemental EIS , including a new vessel traffic study, examining the issues that were not adequately addressed in this DEIS.</p>	<p>Tesoro considered a number of potential alternatives for the design of the proposed project. The alternatives were eliminated from further analysis because they did not meet the objectives of the proposed project and/or one of the two alternatives criteria. A discussion of alternatives considered by Tesoro is included in Section 2.9 of the Draft EIS. The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786).</p> <p>The Draft EIS discusses treaty rights and traditionally used resources in Sections 11.5.1.5 and 11.5.2.3.</p> <p>This Final EIS was developed in response to public comments received by Skagit County on the Draft EIS for the proposed project. Updated information and analyses regarding air quality, environmental health, and tribal resources including the airshed of the Swinomish reservation, archaeological and cultural resources, treaty rights and potential impacts from marine vessel traffic is provided in Sections 3.3, 3.6 and 3.8 of this Final EIS.</p>

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Ch01-061	Swinomish Indian Tribal Community, Larry Wasserman	We request that Skagit County withdraw its Draft EIS pending development of this information, re-publication with notice, and an opportunity for tribes and the public to comment on the analysis. The Appendix to this letter provides detailed information that should be of assistance in developing this revised Draft EIS.	Thank you for your comment. Please see Section 3.8 of this Final EIS for detailed responses to Swinomish letter comments and other similar tribal letter comments.
Ch01-062	Swinomish Indian Tribal Community, Larry Wasserman	<p>4. Requests for Clarifications of the Proposal.</p> <p>We have a number of requests for clarification and future right to notice and comment:</p> <ul style="list-style-type: none"> • It is our understanding that the permits requested for this project that are the subject matter of your SEPA review are limited to the following intensity of use: <p>The proposed project would not change the amount of crude oil received at the facility via pipeline and rail. There would be an increase of five ships per month docking at the refinery’s marine terminal for exporting xylenes and for receiving additional reformat, a petroleum mixture used as a feedstock for xylenes production.</p> <p>DEIS at 1-4.</p> <p>Our comments are offered with the understanding that any future changes to the applications, the proposals, permits, operations, or constructed facilities increasing those use levels would trigger a new comment period and review. It is unclear from conflicting statements in the Draft EIS whether “five ships per month” relates solely to exports of xylene, or includes all of the reformat deliveries to Tesoro needed for the project, as well as the “backhauling” of gasoline blendstock export described in this EIS to other refineries after Xylene has been extracted from the reformat. We therefore reserve the right to comment on impacts that exceed the five ships per month and the current amount of crude oil received at Tesoro by rail and pipeline, without waiving other objections to those operations. We trust this clarification will be helpful to tribes, the public and the permitting agencies, including the U.S. Army Corps of Engineers and the Department of</p>	<p>The proposed project would not increase the amount of crude oil received at or exported from the refinery. Potential environmental impacts associated with increasing the amount of crude oil received or exported were not analyzed in this EIS and would therefore not be authorized under permits issued for the proposed project.</p> <p>The proposed project description does not include an increase beyond the estimated 60 vessels per year (approximately 5 per month). An increase in marine vessel traffic greater than this amount was not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>Section 2.8.2 of the Draft EIS describes the increase in marine vessel traffic as approximately 60 vessels per year (approximately 5 per month). Approximately 40 of those vessels would be delivering reformat feedstock from other West Coast refineries. The remaining 20 vessels calling at Tesoro’s refinery wharf structure would be for exporting mixed xylenes along the vessel transportation route to international markets. Additional information about the vessel types and proposed use for each type of vessel for the proposed project is provided in Section 3.9 of this Final EIS.</p>

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		<p>Natural Resources.</p> <ul style="list-style-type: none"> We request notice of and the right to comment on any future export of crude oil facilitated by this proposal or SEP A review; neither the DEIS or request for comments discloses any proposed operation to export crude oil from the Tesoro Wharf. 	
Ch01-063	Ruth Holder, Phillip Holder	<p>The FEIS must correct the many deficiencies in the DEIS including the omissions, contradictions, absence of studies, reliance on outdated information, failures to acknowledge probable significant adverse impacts, and make recommendations for permit conditions or mitigations . The FEIS must genuinely re-examine the impacts we discuss in our comment and in the comments made by others incorporated by reference herein, identify permit conditions and mitigations for them, and identify any impacts that could not be fully mitigated.</p>	Thank you for your comment.
Ch01-064	Washington State Department of Ecology, Meg Bommarito, Yvonne Kicken	<p>Ecology’s comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.</p>	Thank you for your comment.
Ch01-065	Friends of the San Juans, Stephanie Buffum	<p>In recognition of the environmental matters of mutual concern, in 1996 the Washington Department of Ecology (Ecology) and the British Columbia Ministry of Environment Lands and Parks (MELP) committed the Province and the State to make efforts to share information, consult with one another, and coordinate their work on environmental issues that affect resources and residents in the border region, and to include the regional office of the other jurisdiction in the distribution of environmental assessments for certain major projects.</p> <p>Attached please find the Memorandum of Understanding between the Washington State Department of Ecology and the British Columbia Environmental Assessment Office.</p>	<p>Ecology is aware of the proposed project, has reviewed and commented on the Draft EIS, and is currently drafting the air permit. If Ecology deems it to be applicable, they would share information with the British Columbia Ministry of Environment Lands and Parks in accordance with the current MOU.</p>

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		<p>1(http://www.eao.gov.bc.ca/pdf/MOU_BC-Washington_20031107.pdf (2003).)</p> <p>THE PURPOSE OF THIS MEMORANDUM OF UNDERSTANDING {MOU) TO:</p> <ol style="list-style-type: none"> 1. Facilitate information sharing and mutual understanding of the EA/ER laws, policies and processes of each jurisdiction and facilitate full knowledge of changes; and 2. Facilitate notification and information exchange regarding major project proposals that are in the vicinity of the other jurisdiction. 2. A major project proposal in the State of Washington is considered to be in the vicinity of British Columbia if it is located in any of the following counties within the State of Washington: Clallam, Jefferson, San Juan, Island, Whatcom, Skagit, Chelan, Okanogan, Ferry, Stevens and Pend Oreille. The Tesoro Refining & Marketing Company LLC Clean Products Upgrades Project Draft Environmental Impact Statement qualifies as a major project under this MOU. 	
Ch01-066	Friends of the San Juans, Stephanie Buffum	<p>We also request that the Washington Department of Ecology notify and share information with the British Columbia Ministry of Environment Lands and Parks regarding the Project in accordance with the MOU of 2003. [MEMORANDUM OF UNDERSTANDING BETWEEN THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND THE BRITISH COLUMBIA ENVIRONMENTAL ASSESSMENT OFFICE]</p>	<p>Ecology is aware of the project, has reviewed and commented on the Draft EIS, and is currently drafting the air permit. If Ecology deems it to be applicable, they would share information with the British Columbia Ministry of Environment Lands and Parks in accordance with the current MOU.</p>
Ch01-067	Ruth Holder, Phillip Holder	<p>F. List of Preparers</p> <p>The List of Preparers of the DEIS (Ch. 14) reveals that 35 EIS preparers are a “third party consultant team” in the employ or “affiliated” with ERM, Environmental Resources Management. Who is ERM? At its webpage (http://www.erm.com/en/industries/) ERM advertises to potential clients that it exists to serve “industries” like oil and gas; mining and metal operations and marketing; energy assets; chemical concerns in need of “solutions to increasing regulatory demands;” manufacturing and pharmaceutical concerns; companies in the technology, media and telecom areas; and other industries. ERM</p>	<p>ERM was selected by, and worked under the direction of, Skagit County to prepare the Draft EIS. Federal, state, and local agencies often hire third-party contractors to assist in preparing EIS documents. In this role, ERM acted as an extension to the County’s staff; however, the County is ultimately responsible for all analysis, content, description of potential impacts, mitigation requirements, and the decision with respect to the proposed project in accordance with SEPA.</p> <p>After completion of this Final EIS, Tesoro would need to obtain permits and authorizations to construct and operate the proposed project. A summary of anticipated permits and</p>

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		<p>does not purport primarily to serve regulatory authorities, permitting agencies, or governmental bodies charged with protecting the public trust, public interest, environmental integrity, or worker safety. To state the obvious, the permitting authorities for which the DEIS has been published are not an “industry,” and the legitimate purpose of this DEIS is most certainly not to help industry cope with “increasing regulatory demands.” Regulatory requirements, whether by statute, ordinance, rule, or other legal requirement, are the framework and platform for a proper DEIS. We are concerned that the drafting of the DEIS may not have been compiled with the obligations of the permitting authorities fully in mind, but that ERM’s past and ongoing work for Tesoro (http://www.erm.com/en/insights/case-studies/case-study-tesoro-petroleum/), and future work for Tesoro and other oil and petrochemical clients may have influenced the DEIS compiled by ERM. The permitting authorities should satisfy themselves and the public that this DEIS is not a fundamentally flawed product reporting to two masters whose interests do not always coincide, rather than one that solely applies the regulatory standards in a conscientious way.</p> <p>G. Conclusion</p> <p>We look forward to a Final Environmental Impact Statement that corrects the omissions and deficiencies in the DEIS. We believe that the Skagit County Development Services Department and other permitting agencies take seriously their responsibilities to safeguard the health, safety and welfare of our Skagit communities and to perform their duties as trustees of the Public Trust protecting the air, atmosphere, water, and wildlife. The FEIS must support and facilitate permit conditions and mitigations that protect refinery workers, the surrounding human community, and the environment; perform an intellectually rigorous analysis of all the issues at play, and give the public solid grounds to believe in the integrity of this process.</p>	<p>approvals, and the relevant agencies, is provided in Section 1.4.5 of the Draft EIS. Additional information regarding agencies responsible for various aspects of the proposed project discussed in the Draft EIS and mentioned in comments received is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch01-068	Anacortes Chamber of Commerce, Stephanie	The Draft Environmental Impact Statement (DEIS) that the County has prepared does an excellent job examining all the potential	Thank you for your comment.

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	Hamilton	<p>impacts to the local land, air and marine environments. The protection of these resources is critical to the continued success of the Anacortes community.</p> <p>The Summary of Impacts and Proposed Mitigations included in Table ES-2 of the DEIS highlight the extreme care and effort that Tesoro put into designing and engineering this project. Your careful examination of the projects potential impacts shows that the project has been prepared and planned so that no additional mitigation measures are necessary to augment the protections already included in the project design.</p>	
Ch01-069	Anacortes Chamber of Commerce, Stephanie Hamilton	I thank you for the time and effort Skagit County has invested in preparing this complete and comprehensive Draft Environmental Impact Statement and I urge you to approve the appropriate permits so that this project can move forward.	Thank you for your comment.
Ch01-070	Pilchuck Audubon Society, Allen Gibbs	In closing, we appreciate the opportunity to comment, and especially are grateful that Skagit County early on required a full EIS.	Thank you for your comment.
Ch01-071	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians	We appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Tesoro Refinery's expansion project known as CPUP. We recognize the extraordinary amount of work that has gone into completing this draft. And we applaud your effort to make the this process accessible to the public. The public hearing on April 17 was well managed and informative. The ability to access this information online has been effective and the outreach to the community has been appreciated. Thank you	Thank you for your comment.

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	for Social Responsibility, Friends of the Columbia Gorge		
Ch01-072	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	We are also concerned that several aspects of Tesoro’s proposed project will have significant and unmitigatable impacts that were underrepresented in the DEIS.	Thank you for your comment.
Ch01-073	Tesoro Anacortes Refinery, Rebecca Spurling	Tesoro appreciates the effort that Skagit County has undergone to prepare its extensive analysis of the impacts of the proposed CPUP and believes this document will greatly assist the agencies as they issue required permits for the CPUP.	Thank you for your comment.
Ch01-074	Tesoro Anacortes Refinery, Rebecca Spurling	We recognize that the Final Environmental Impact Statement (FEIS) is not a permit for a project, but informs decision makers with technical, objective information about the project. It facilitates thorough and consistent review by all agencies that will make permitting decisions based on the impacts assessed in the FEIS and best informs the public about the upgrades that Tesoro is pursuing at the Refinery.	The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS and in accordance with SEPA guidelines, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the supporting analysis of impacts in each of the resource chapters. The SEPA

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		<p>Our comments are grounded in the SEPA regulations, which address significant environmental impacts in a number of places within the rules. As pointed out in the DEIS, SEPA regulations define “significant” as a “reasonable likelihood of more than a moderate adverse impact on environmental quality.”² Therefore, when considering whether an environmental impact is “significant” under SEPA, both the likelihood {“reasonable”) and the severity of consequences {“more than a moderate adverse impact”) must be considered.</p> <p>SEPA rules also provide guidance on when an impact should be considered likely or probable by defining “probable” as ... “likely or reasonably likely to occur” and cross-referencing the definition of “significant” in WAC 197-11-794. “Probable” distinguishes the “likely impacts from those that merely have a possibility of occurring, but are remote or speculative.”³ This is not meant as a strict statistical probability test.⁴ Many of the impacts discussed in the DEIS have a very remote or speculative likelihood of occurring. Thus, under WAC 197-11-782 and WAC 197-11-794, the FEIS should reflect that these impacts are not significant.</p>	<p>Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant.</p> <p>The SEPA Rules define “significant” as something that has a reasonable likelihood of more than a moderate adverse impact on environmental quality. Significance involves context and intensity and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred (WAC 197-11-794). The potential impacts from an uncontrolled spill (i.e., no spill response), for example, were identified as being potentially significant for a worst-case spill or maximum most probable spill and less than significant for an average most probable spill.</p>
Ch01-075	Tesoro Anacortes Refinery, Rebecca Spurling	In addition to these narrative comments, we are also providing a spreadsheet with detailed comments as Appendix 1, which suggest specific corrections to be included in the FEIS, and a corrected table 13-6 as Appendix 2.	Thank you for your comment.
Ch01-076	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth,	<p>Tesoro Anacortes Refinery Clean Products Upgrade Project Vessel Traffic Assessment</p> <p>There is a vessel traffic assessment that was prepared specifically for this DEIS and is referenced in Chapter 13 Marine Transportation. However, this vessel traffic assessment was not included with the DEIS when it was published on March 23, 2017. This assessment was only posted to the DEIS website (on the library webpage), after it was requested, on Tuesday April 25.</p> <p>The public should have the full 45 days for review and comment, not the 13 days provided.</p>	The Draft EIS was developed in accordance with SEPA Rules for style and content, which require that EIS documents are readable and not overly technical (WAC 197-11-425). Additional descriptive material or supporting documentation may be placed in appendices or in separate documents at the discretion of the lead agency (WAC 197-11-425(5)). The Vessel Traffic Assessment Technical Report was submitted by Tesoro with their permit application. It was requested by a member of the public on April 24, 2017, and was posted to the project website on April 25, 2017.

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	Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge		
Ch01-077	Skagit Business Alliance, Christina Jennings	We believe the Draft Environmental Impact Statement (DEIS) issued by the County provides a complete and accurate description of potential impacts to the local land, air and marine environments. We concur with the Summary of Impacts and Proposed Mitigations included in Table ES-2 of the DE IS which concludes that this project has been designed and engineered in a manner that does not require additional mitigation measures.	Thank you for your comment.
Ch01-078	Barbara Tuttle	For these and many other reasons, please consider requiring a more comprehensive EIS for this project.	Thank you for your comment.
Ch01-079	United Steelworkers Local 12-591, George Welch, Gordon Zurn	we have concerns related to safety and health, and the absence an independent and unbiased analysis of the impacts on the environment attributed to CPUP. We urge you to fully utilize the Environmental Impact Statement process to objectively address the specific concerns raised below.	Thank you for your comment.
Ch01-080	United Steelworkers Local 12-591, George Welch, Gordon Zurn	NEED FOR COMMITMENTS USW Local12-591 has been engaged with environmental advocacy groups, such as Stand Earth, and other labor organizations. While we do not purport to speak for them, we do share similar concerns with green lighting CPUP, as noted above. And while these other organization may be neutral on the project, we are advocating that CPUP be approved on the basis that the issues referenced above be addressed by Tesoro through enforceable and meaningful commitments to the employees' sole bargaining representative (USW) and the State of	Thank you for your comment.

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		<p>Washington.</p> <p>USW 12-591 offers these comments in good faith and thanks those professional and dedicated folks who will prepare the Final Environmental Impact Statement for their careful consideration the comments contained herein.</p>	
Ch01-081	Ursula Mass	<p>I read all of your fact sheets about studies made of Surface Water, Groundwater, Wetlands, Air quality, climate change, Marine Waters, Marine Vegetation, Marine Wild life, Birds Amphibians and reptiles, Terrestrial animals, Terrestrial vegetation, special status species.</p> <p>Your conclusions are that impact levels for most are less than significant, except 5 out of 34.</p> <p>The accumulative effects should be taken in to consideration and studied more extensively.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13 of the Draft EIS. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals).</p>
Ch01-082	Sigrid Asmus	<p>Further, I ask that the Skagit County board not hesitate to use its fullest authority to hold Tesoro fully accountable for all its actions, both now and in the future.</p>	<p>Thank you for your comment.</p>
Ch01-083	Mary Heath	<p>It is my opinion that the proposed project should be given deeper review than the draft EIS.</p>	<p>Thank you for your comment.</p>
Ch01-084	Sigrid Asmus	<p>Moreover, the record shows that corporations like Tesoro are unable to show evidence of responsible operation. I ask that the Skagit County board not approve the building or operation of new xyene-manufacturing facilities or the transport of more oil in the Salish Sea and the Northwest Coast.</p> <p>To act without demanding compliance with an adequate DEIS and without requiring full mitigation measures would risk major harm to the Northwest Coast, the Salish Sea, our irreplaceable environment, and set a dangerous precedent for uncontrolled exploitation of Washington State’s fragile coast.</p>	<p>The purpose of the EIS is to provide discussion of potential significant environmental impacts of the proposed project and reasonable alternatives. The Draft EIS discusses the potential impacts of the proposed project and the measures being taken to avoid or minimize potential impacts in Chapters 3 through 13. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Ch01-085	Mary Heath	<p>I have other concerns including orca whale and climate change impact, but my strongest are those listed above [xylene exposure</p>	<p>Thank you for your comment.</p>

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		and vessel spills]. I urge the EIS be deepened and strengthened to assure safety and health--of our people, our water, our climate, our natural world--should this project move forward.	
Ch01-086	Joline Betterndorf	A more thorough examination than has been offered by the draft EIS should be demanded before going forward with this problematical expansion. I particularly question the company's "mitigable" claims.	Thank you for your comment.
Ch01-087	Esther Lultikhuizen	- I do not understand why this environmental impact study did NOT include Island County - is it because they have everything to lose by this proposed CPUP project? This is a strange oversight.	<p>Potential impacts to Island County, including potential impacts that could occur along the marine vessel transportation route, were considered in the following chapters of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Chapter 4 • Marine and nearshore resources – Chapter 7 • Environmental health – Chapter 9 • Land use and shoreline use – Chapter 10 • Social and economic environment – Chapter 11 • Marine transportation – Chapter 13
Ch01-088	Maradel Gale	There are some real problems with the DEIS, and those need to be remedied before any permits are granted this project.	Thank you for your comment.
Ch01-089	Janice Bultmann	Thank you for giving the public the opportunity to comment on the Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Ch01-090	Mary Travers	I hope you will consider this more than a comment, but a plea for action by you.	Thank you for your comment.
Ch01-091	Susan Hathaway	The DEIS purposely does not include a thorough review of the safety requirements and full impacts of the project.	Thank you for your comment.
Ch01-092	Valerie Shubert	Every EIS which has an impact on the neighborhoods around should be available (1) In hard copy,(2) at least 2 months before the effective date, (3) free of charge, and (4) 24 hours/day. If possible, residents should be sent a postcard advising that the EIS is available, which enables interested parties to have a copy sent	Information on the release and notification of the Draft EIS is provided in Section 1.4 of the Draft EIS and in Chapter 2 of this Final EIS. Public notice was completed in accordance with the SEPA Rules and Skagit County Code.

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		to them, along with packing materials to enable it to be returned.	
Ch01-093	Tom Schwegler	As a supporter of the Natural Resources Defense Council, the Environmental Defense Fund, Earth Justice, Food & Water Watch and other environmental organizations, I want to thank you for the opportunity to comment on the Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Ch01-094	Deborah Rudnick	I feel confident that if these considerations [listed in form 9] were fully considered and analyzed, the true costs to the people and wildlife of the Salish Sea would be quantified as far higher than DEIS currently acknowledges.	Thank you for your comment.
Ch01-095	Julia Glover	This is SO IMPORTANT!!!! Please consider my comments seriously! Please consider the good of EVERYONE here,,	Thank you for your comment.
Ch01-096	Trace Farrell	A great deal of time and attention and research has one into these requests. I hope you will give them the same.	Thank you for your comment.
Ch01-097	Gayla Shoemake	Tesoro has combined two projects, trying to avoid closer scrutiny of each separate part.	Thank you for your comment.
Ch01-098	Sigrid Asmus	It is appalling that the DEIS does includes neither a thorough review of the safety requirements, not an anywhere near adequate assessment of the full extent of the immediate and continuing impacts of the project.	Thank you for your comment.
Ch01-099	Carolyn Barney, Lyndon Greene	We strongly oppose issuing a permit to Tesoro to build a Xylene facility in Anacortes as well as any increase in shipping in the Salish Sea, especially Fidalgo Bay and Padilla Bay. If you are simply taking a head count on this issue, please count two more people against this proposal. I suspect, however, you are carefully considering all aspects of this very controversial issue.	Thank you for your comment.

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Ch01-100	Elizabeth Milburn	I am concerned a thorough environmental review of this expansion has not been performed.	Thank you for your comment.
Ch01-101	Rene Vance	I believe the Draft Environmental Impact Statement (DEIS) adequately addressed the issues to consider, and the appropriate prevention and mitigation measures.	Thank you for your comment.
Ch01-102	Rene Vance	I appreciate the thoroughness and attention to detail that went into the DEIS. I believe it addresses the concerns for the community. I support Tesoro's project and their willingness to invest in the Anacortes Community.	Thank you for your comment.
Ch01-103	Joan Poor	As an Edmonds resident and frequent visitor to the San Juan Islands I urge you to fully consider the environmental impacts associated with the proposed expansion at the Tesoro Anacortes Refinery for the manufacture and export of xylene.	Thank you for your comment.
Ch01-104	Gay Wilmerding	Re production of a toxic chemical for a dated industry being transported through an ecological biogem, please examine every aspect from product ingredients, to production fumes, spill likelihood, and shipping effects to protect air and water quality and human and wildlife health.	Thank you for your comment.
Ch01-105	Joe Bucek	It is my opinion that the proposed project should be given deeper review than the draft EIS.	Thank you for your comment.
Ch01-106	Alexander McIntyre	By including these requests [Form 10 additions to the EIS] it will ensure more transparency and accountability in regards to what is happening to our environment and will allow for a more just transition to a cleaner and safer community for all.	Thank you for your comment.
Ch01-107	Nancy Morgan	I also write as...an individual who has lived in areas where this type of proposal was NOT looked at thoroughly, and both the region and the commercial enterprises suffered.	Thank you for your comment.
Ch01-108	Margaret Lee	In addition, this project should be submitted to FEMA to confirm it meets NEW REGULATIONS THAT MUST BE MET TO OBTAIN	Section 5.3.1 of the Draft EIS includes an analysis of the location of the proposed project in relation to current established

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		INSURANCE IN FLOODPLAINS, including that no endangered species will be affected.	floodplains. The 3-inch natural gas line and DSU are located on the causeway and wharf, within the mapped 100-year floodplain. These proposed project components would be installed on the existing causeway and wharf structure and therefore would not result in the alteration of current floodplain surface hydrology. The other proposed project components are located upland of the 100-year floodplain (see Figure 5-3 of the Draft EIS). Development within designated special flood hazard areas such as the 100-year floodplain must adhere to specific requirements including conformance with flood damage prevention standards in SCC 14.34 and the international building codes and must not alter the floodplain boundaries or adversely impact species protected under the ESA.
Ch01-109	Jerome Whitaker	I remind you that your position on Planning and Development services board are to serve and protect the public, over the goals of corporations,	Thank you for your comment.
Ch01-110	Glen Anderson	I AM COUNTING ON YOU TO MAKE THE ETHICALLY RESPONSIBLE DECISIONS TO PROTECT HUMAN HEALTH AND OUR ENVIRONMENT.	Thank you for your comment.
Ch01-111	Mary Hanson	Your job is to prevent poisoning our land and water.	Thank you for your comment.
Ch01-112	Sierra Nelson	I am not opposed to industrial expansion, but it is critical that oversight is in place and safety regulations are carefully followed. This is good for business, the environment, and the community.	Thank you for your comment.
Ch01-113	Janet Weedman	Thank you for your service to our community and hearing my voice regarding the Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Ch01-114	Henrik V Christiansen	While the potential impacts to the environment and local resources are clearly described along with the planned prevention and mitigation measures, the positive aspects of the project don't appear to be as prominently presented.	The purpose of the EIS is to provide discussion of potential significant environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality. However, in accordance with SEPA Rules, beneficial environmental impacts may be discussed (see WAC 197-11-400 and 402). The Draft EIS discusses the economic benefits of the proposed project within

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			the study area in Sections 11.5.2 and 11.6.2.
Ch01-115	Susan Allen	I'm curious as to whether decision makers have lost their minds. Who in their right mind would approve something like this.	Thank you for your comment.
Ch01-116	Elizabeth Bartlett	I ask you to consider all facets of this project and count all its costs before you decide whether or not to approve it. Indirect costs like environmental damage can be hard to add up, even hard to envision, but they are often the most significant costs of a project. Citizens rely on you to protect your community, for the sake of those who live there and for all of the rest of us who love the beauty of the Pacific Northwest and want to continue visiting it.	Thank you for your comment.
Ch01-117	Aaron Adams	I appreciate the fact that you are willing to accept public comments on this hazardous project. An excellent first step to being on the right side of history is being willing to listen to the voice of rationality. However, you have to act on this voice, which is what I hope you will do swiftly and decisively.	Thank you for your comment.
Ch01-118	Karen Nelson	A complete review of the FULL social and environmental IMPACTS of this expansion must be made prior to any decision to permit this expansion.	Thank you for your comment.
Ch01-119	Kym Garcia	Consult with other authorities in addition to NOAA for a proper assessment (WHOI, etc)	After completion of this Final EIS, Tesoro would also need to obtain permits and authorizations to construct and operate the proposed project. A summary of anticipated permits and approvals, and the relevant agencies, is provided in Section 1.4.5 of the Draft EIS. Additional information regarding agencies responsible for regulating the proposed project is provided in Table 2 in Section 3.1 of this Final EIS.
Ch01-120	Paul Fellows	I understand that the DEIS only reaches limited conclusions as to the impacts that may be caused. In any case, at minimum, the recommended considerations listed below [Form 11] MUST be the minimum that the final EIS addresses.	Thank you for your comment.
Ch01-121	Glenna Hayes	I am writing to urge you to heed the call of the members of the	Thank you for your comment.

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		community of Skagit County to assure that the proposed project meets all of the environmental and social concerns addressed in this letter.	
Ch01-122	Glen Anderson	Over and over again, we see the EIS procedures and governmental procedures skewed in favor of BIG POLLUTING BUSINESS CORPORATIONS. This is happening again with the DEIS regarding the Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Ch01-123	Sue O'Donnell	So, thank you for the care you take as you comb through the comments on the DEIS. It's just a draft and needs much more work to cover all the problems.	Thank you for your comment.
Ch01-124	Mully Mullally	It is unclear if any citizen comments really do matter. I have been communicating about the issue of the increased Growler population and the specific impact on the Water Quality of Central and north Whidbey, as well as the Noise pollution...and, so far it is unclear that this type of feedback really has an impact.	Thank you for your comment.

Chapter 2: Proposed Action and Alternatives

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Ch02-001	Veronica Bush	Still, I believe the planning is weak at best and should change completely to the use of mineral oil which has been proven to work effectively in the same industry.	Thank you for your comment.
Ch02-002	Veronica Bush	Mineral oils are a safer and cheaper substitute than xylene, and I ask that we move in the direction of using this method instead of putting natural habitats and soil at risk.	Thank you for your comment.
Ch02-003	Peggy Printz	The low sulfur fuel upgrades should be considered independently in an alternative that does not include the xylene plant upgrades.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-004	Sandra Kraus	I believe the reduced sulfur emissions could have been accomplished without the mixed xylene component being added or so it sounds.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at

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			<p>a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-005	Gary McCabe	<p>Also, it seems like they could have proceeded with the sulfur reduction so they would comply with Tier 3 WITHOUT adding the mixed xylene component?</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-006	Gary McCabe	<p>And, it sounds like they're going to monitor themselves and do their own inspection of all pumps and equipment which would be completely unacceptable.</p>	<p>Tesoro performs its own inspections and monitoring at the refinery and is subject to outside regulatory verification that the applicable regulations are being followed. Self-monitoring and reporting is standard operating practice. Outside regulators do periodically inspect the facility and review monitoring reports to confirm that Tesoro is in compliance with applicable regulations and permit conditions. A list of required permits for the proposed project and responsible agencies is provided in Table 1-1 in Section 1.4.5 of the Draft EIS. Additional information regarding agencies responsible for regulating environmental and safety issues through monitoring, inspections, and other means is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch02-007	Gayle Janzen	<p>I also request that the low sulfur fuel upgrades should be considered independently in an alternative that does not include the xylene plant upgrades.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver</p>

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			<p>cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-008	Janet Alderton	<p>What will be the fate of the benzene, toluene, and ethylbenzene that are significant hazardous components of reformate backhaul? These hazardous components should be combusted on-site in a combined heat and power system.</p>	<p>Benzene and ethylbenzene are not components of reformate backhaul (see Table 2-1 in Section 2.1 of the Draft EIS). The only toxic chemicals present in the reformate backhaul are toluene and isopropylbenzene compounds. Reformate backhaul would be either used as gasoline blendstock or sent to other refineries for use as gasoline blendstock. See Section 2.8.4.2 of the Draft EIS for further discussion.</p> <p>The steam boiler identified for the proposed project is a heat recovery boiler that produces steam at the desired pressure for the process usage. The use of a combined heat and power system would decrease the steam pressure and require additional energy input or compression to raise the steam pressure back up to the required level. Waste heat from the steam boiler would be directed to the heat recovery section of the boiler and would be used elsewhere to potentially reduce combustion in other process heaters. Additional information regarding the applicability of a combined heat and power system at the refinery is provided in Section 3.2 of this Final EIS.</p>
Ch02-009	Ruth LeBrun	<p>1) YES - Do install a system that captures air emissions during marine vessel loading. 2) YES- Do upgrade a production unit to help reduce the sulfur content in gasoline. 3} NO!!- Do not allow "adding a unit" to make high-octane products that can be added to gasoline, and 4) ABSOLUTELY NO-</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the</p>

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		Do not allow "adding a unit" to separate mixed xylenes as a separate product.	lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-010	John Janson	separate the two [xylene production and improving equipment] I mentioned above and I will give full support for one.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-011	Sandra Kraus	I urge you to take the NO ACTION alternative.	Thank you for your comment.
Ch02-012	Jacob Pederson	<p>It has come to my attention that your Draft Environmental Impact Statement concerning the upgrade and expansion of the Tesoro Plant on March's Point, adjacent to Nationally recognized Padilla Bay Estuarian Preserve, is missing some of the alternatives that should be included for the best decision to be made.</p> <p>Tesoro's Plan, the Clean Products Update Project (CPUP) includes a lower sulfur fuel improvement by way of a better naphtaha hydrotreater (NHT), and a Marine Vapor Emission Control (MVEC) unit, but they have lumped it together with the xylene expansion aspect of the project, installing an Aromatics Recovery Method</p>	<p>Tesoro considered a number of potential alternatives for the design of the proposed project. The alternatives were eliminated from further analysis because they did not meet the objectives of the proposed project and/or one of the two alternatives criteria. A discussion of alternatives considered by Tesoro is included in Section 2.9 of the Draft EIS.</p> <p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver</p>

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		<p>(ARU) unit, plus a new boiler to power the new equipment. The alternatives stated in your impact statement are, (paraphrased) as follows; "implement the project as is," or "do not go through with the project." However, there are several more alternatives that can be implemented. The boiler idea is a good idea, but highly is inefficient the way it will be used. The heat from the steam will be used for heating up the reformat to extract xylene. A cheap, and mutually beneficial alternative would be to add a turbine so that, as the steam travels to the reformat, it will produce electricity for Tesoro to sell, or to use in it's operations. This will cut down on the increased carbon emissions from the new boiler, about 380,000 metric tons of carbon dioxide a year. One of the largest carbon dioxide emitters is the energy production sector, which largely uses boilers to produce steam to produce electricity, there is no reason why the boiler cannot be used for a dual purpose. I realize that most of our power in the Pacific Northwest comes from largely carbon neutral hydropower, but as more people move to this area and salmon activists fight new dams, we will start needing to turn to steam technology to fill the power grid void that is likely coming in the near future, and this Tesoro project, if this alternative is put into place, could actually benefit us in that way.</p>	<p>cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p> <p>Additional information regarding technology alternatives is provided in Section 3.2 of this Final EIS.</p>
Ch02-013	Anonymous	<p>Why is Tesoro not investing in wind energy with the same energy, with the same resources? Surely with the constant intense winds in this area it would be a prime location... Why not invest in truly clean products that will also produce jobs.</p>	<p>Developing a wind energy project does not meet the objectives of the proposed project (see Section 1.2 of the Draft EIS). The SEPA Rules (WAC 197-11-402(1)) require the lead agency to analyze reasonable alternatives when preparing an EIS. Reasonable alternatives are defined as actions that could feasibly attain or approximate a proposal's objectives (WAC 197-11-786).</p>
Ch02-014	Jacob Pederson	<p>I recommend that a combination of these alternatives [producing electricity from steam & replacing tankers with ATBs] be imposed on the project in order for it to get the green light to fully address all of the ecological impacts, and to make the best use of the potential energy that could be utilized in the community, directly or indirectly, if our cards are played right. They can also be lumped into one, which would be a better option so that their being used in unison to make this a community-safe, and</p>	<p>Tesoro considered a number of potential alternatives for the design of the proposed project. The alternatives were eliminated from further analysis because they did not meet the objectives of the proposed project and/or one of the two alternatives criteria. A discussion of alternatives considered by Tesoro is included in Section 2.9 of the Draft EIS. Additional information regarding technology alternatives, such as producing electricity from steam, is provided in Section 3.2 of this Final EIS.</p>

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		community beneficial project would be more likely to occur. Thank you for your time, and all your hard work on the Environmental Impact Statement.	The proposed project includes the transport of xylenes and reformate using tankships and tank barges, including ATBs (see Section 2.8.2 and Chapter 13 of the Draft EIS). Additional information regarding the types of vessels proposed to be used is provided in Section 3.9.1 of this Final EIS.
Ch02-015	Level Pratt	I want to say that I support the clean products upgrade portion of the DEIS, but not the proposal to produce xylene and increase vessel traffic for the production and export.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-016	Colin Stewart	How can we better use this land? I'm proposing that Anacortes citizens vet the Tesoro corporation to come and make a proposal to use the pre-existing infrastructure to build their lithium ion battery producing factories. These factories make in upwards of 2,000 full-time jobs. That's over two times more than Tesoro and Shell.	Converting the refinery into a lithium ion battery producing factory does not meet the objectives of the proposed project (see Section 1.2 of the Draft EIS). The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS (WAC 197-11-440(5)(b)). Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Reasonable alternatives are discussed in Section 2.9 of the Draft EIS.
Ch02-017	Libby Mills	I support a Final EIS alternative, which I haven't seen, with only the clean air components of the project and without the xylene production and export.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of

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			<p>the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-018	John Doyle	<p>In the proposed alternatives, Tesoro is installing a volatile organic (VOC) recovery facility in the marine docking area. They evaluated recycling the VOCs into the product line or sending it to a new combustion unit. They decided to burn the recovered VOCs because it is slightly less effective (2%) and more costly. I disagree with this assessment. The priority should be given to maximum use of the resource. The plant should be minimizing any exhaust production.</p>	<p>Tesoro evaluated different options to capture vapor emissions while loading vessels at the refinery wharf. The use of a VRU and a VCU was considered. Tesoro chose the VCU primarily because it has a higher level of VOC control (i.e., results in lower VOC emissions). The determination to use a VCU over a VRU is discussed in Section 2.9.1.3 of the Draft EIS.</p>
Ch02-019	Evelyn Adams	<p>I also request that you consider, as an alternative to the entire proposal, permitting only the components that would reduce sulphur in refined products such as gasoline, which is a step in the right direction.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>

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Ch02-020	Bob Hall	<p>1. Please add more alternatives. Besides the existing two in the DEIS, there need to be others that lead to cleaner gasoline products without making xylene. How will other refineries meet the new standards without making xyline?</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-021	Sally Stapp-Brigham	<p>I enthusiastically support (Open House speaker) Colin Stewart's plan to encourage Tesoro to embrace clean energy - make lithium ion batteries for example. Leave fossil fuel in the ground! Come on Anacortes - get it right this time.</p>	<p>Converting the refinery into a lithium ion battery producing factory does not meet the objectives of the proposed project (see Section 1.2 of the Draft EIS). The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS (WAC 197-11-440(5)(b)). Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Reasonable alternatives are discussed in Section 2.9 of the Draft EIS.</p>
Ch02-022	Jan Gordon	<p>I recommend the sulfur cleanup and no to the xylene production and shipping.</p> <p>Tesoro has a great place for wind generation, solar and other renewables that will create clean energy and jobs for the now and the future.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that</p>

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			<p>could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-023	Eddy Ury	<p>So, you know, with the upgrade project that resulted in overall improvements -- less impacts at the refineries, ongoing operations, less risk, less pollution -- there would be nothing to oppose. We have no reason not to support it all together. But we do have several concerns with the projects and some of the flaws in the Draft EIS. So, first off, the Clean Products Upgrade is an aggregation of separate projects. So, xylenes are not clean products; they're toxic. And marine spills of xylenes would cause significant unmitigable impacts. So, we don't see why there should be a requirement for agencies to have to permit the aromatics recovery unit in the same package as the naphthohydrotreater and the MVAC system. What we're hoping is that there will be an alternative proposal in the Final EIS that segments the components of these aggregated upgrade projects, that can show the impacts of the clean products upgrade without the xylene processing and exports. Right now the draft says that there, you know, would be more environmental impacts with not doing this project than doing it. I think it would be fair to look at an alternative proposal which shows when you can do some of it, without doing all of it.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-024	Carolyn Gastellum	<p>Please consider, as a stand-alone alternative, only permitting the project components to produce low sulfur fuels. I requested an analysis of impacts for just below sulfur fuels upgrades without the xylene processing and shipment components.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at</p>

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			<p>a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-025	Carolyn Gastellum	<p>I request, as a stand-alone alternative, only permitting the project components to produce low sulfur fuels.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-026	Martha Hall	<p>2. Why were no other options considered besides approving and not approving this project to achieve one of the goals, cleaner gasoline products? There must be other ways to meet the higher standard for gasoline products besides adding more pollution in yet another and new way, making xylene.</p> <p>3. The EIS says this is the "only feasible option that would work within the existing refinery configuration". To meet the new requirements for gasoline, could the refinery be reconfigured? If so, what would that look like, what would the cost be, etc.? This needs to be explored in the EIS: Is Shell meeting the new standards without a proposal to make Xylene?</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS. Additional information regarding technology alternatives is provided in Section 3.2 of this Final EIS.</p>

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Ch02-027	Anne Winkes	The FEIS must consider the alternative action of allowing only the project's clean air components without xylene production.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-028	Timothy Manns	Secondly, we feel it would be appropriate to have limited and no action in the full implementation of alternatives. We suggest the analysis of a third one -- describing building the parts of the project to reduce sulfur content and fuels, but not the xylene production facilities.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-029	Edward John McLeod	Fossil fuels and their byproducts have served the early industrial revolution well and in many ways have brought convenience and mobility to the masses. The time has come and the technologies have evolved now to seriously consider alternatives to packaging, transportation methods and power generation which don't rely on unearthing fossil fuels and all the harmful side effects of doing	Thank you for your comment.

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Ch02-030	Maureen Scheetz	And I actually think that I cannot support expanding the refinery anymore. I am -- I've had a hard time living in the community with -- with the feeling that we have this incredible jam here in the Pacific Northwest. Skagit Valley and Fidalgo Island -- it's hard to beat anywhere in the world. I've been to over 33 countries, searching. I think we could do something much more creative and more intelligent with the land and our time and our resources.	Thank you for your comment.
Ch02-031	Maureen Scheetz	I actually sent a proposal to Shell refinery in 2009 to create an arboretum on their land -- and with community support, with lots of organizations supporting me -- Skagit County employees, pretty much every organization around -- and I was shot down, because I didn't have everybody organized and all the money in place before they would even meet with me. So, recently -- last fall -- I sent the same proposal. I didn't even amend it. I just sent it over to Tesoro, and I was shot down again on that idea. I think we could do wind, or we could do solar, in that area. I think 15 acres -- I'm just learning of this 18 acres of impermeable surface.	Thank you for your comment.
Ch02-032	Carlo Voli	I would request that you separate the xylene component from this project and exclude that and not authorize that, and go ahead with the other proposals.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.

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Ch02-033	Marylee Chamberlain	There are two components in this proposal -- one with the air quality piece, and the other with the xylene production. I would like to see that this whole thing be looked at as separate, rather than having the option to look at the whole thing or none of it. I would like to see that these are separated so that they get the direct examination that they require.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-034	Stacy Oaks	I want to strongly urge that the xylene proportion be considered separately.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-035	Alex Ramel	First, we've heard a lot of folks talking this evening about requests to approve only the clean products elements or [unintelligible] the xylene portion of the project. And I just want to make clear that in Draft Environmental Impact Statement language, specifically what we're asking for is that the county create an alternative that includes only the low sulfur	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks,

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		components and that that alternative be included in the Final EIS.	diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-036	Sue O'Donnell	Does the "Clean Products" refer to getting the sulfur out of gasoline? Well GOOD. ONLY DO THAT!	Thank you for your comment.
Ch02-037	Joanne Schoettler	also separate the xylene because xylene is the poison.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-038	Bob Zeigler	The USEPA has adopted new, more stringent fuel standards that require lowering the sulfur content in gasoline, which went into effect January 1, 2017. Could there be an alternative that includes process to just remove sulfur per USEPA requirements and not expand xylene production? I recommend that be the preferred alternative.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS.

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			Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-039	Joanna Idczak	De-link the permits for the cleaning of gasoline, and the xylene plant. The sandwiching of the permit items together seems like a marketing ploy to sneak it through. The addition of ramping up new facilities for a new product (xylene) makes the title of the permit a flagrant euphemism: "Prevention of Significant Deterioration Permit".	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-040	Betsy Toll	I only support the elements of Tesoro's proposal that are necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels.	Thank you for your comment.
Ch02-041	John A Lee	While I support the facility's upgrades or modifications necessary to comply with Clean Air Act requirements, I oppose expansions that aim to increase the export of petrochemicals.	Thank you for your comment.
Ch02-042	Marylee Chamberlain	Again, I'm going to leave it with -- look at two separate pieces here, rather than all or nothing.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the

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			<p>lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-043	David Henry	The flammability and transportation risks are too high and stronger alternatives need to be considered.	Thank you for your comment.
Ch02-044	Jim Ciecko	<p>I am a resident of western Skagit County and have some serious concerns regarding the production of xylene at the Tesoro refinery in Anacortes. I agree with the LaConner town council resolution that xylene production needs its own separate evaluation for its potential health impacts to the workers at the the refinery as well as the surrounding communities. There is nothing about the discussion of the overall project, including improvements to the NHT and the installation of a MVEC system that explains the need to produce xylene.</p>	<p>Health risks to both workers and community members related to xylenes are discussed in Section 9.6.2 of the Draft EIS and Section 3.6 of this Final EIS. A description of xylenes production as part of the proposed project can be found in Section 2.1 of the Draft EIS.</p> <p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786).</p> <p>The safety measures and procedures that are in place at the refinery are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding</p>

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			agencies responsible for regulating the worker health and safety is provided in Table 2 and Section 3.1 of this Final EIS.
Ch02-045	Jim lombard	I would like to comment on this Draft EIS for this project, which I am against except for the single portion involving low-sulfur fuels production. This facility should not be used for the manufacture or transport of Xylene.	Thank you for your comment.
Ch02-046	Jim lombard	<p>First: The project alternatives are inadequate.</p> <p>Solution: There should be an alternative that includes only the low-sulfur fuels production.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-047	Sara Holahan	<p>I am troubled by the Tesoro Draft EIS and do not think this project should be approved without more scientific and analytical processes. Also, the multiple projects should be separated out.</p> <p>By conducting an EIS for two quite different projects in one analysis is misleading and is not serving the public. Tesoro states the objectives of wanting to produce cleaner gasoline (legally required) and start processing mixed xylenes. These are very different: proposing to produce 15,000 BPD of toxic xylene, but asking for approval under the title of “Clean Products Upgrade Project” is unacceptable. 15,000 BPD is over 10% of the currently allowed 120,000 BPD of crude oil processing and a serious increase. These two projects must be evaluated under two separate EISs. For example, under the list of reasonable</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount</p>

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		<p>alternatives, it evaluated the plan for more production of steam and heat needed for the project. We need to know exactly how much additional heat is required for the Vapor Combustion Unit, how much for the MVEC, and exactly how much would be needed for producing mixed xylenes(ARU).</p>	<p>of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS. Additional information on technology alternatives is described in Section 3.2 of this Final EIS.</p> <p>The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.</p> <p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>Several commenters suggested specifically that cogeneration or CHP should have been selected as BACT instead of a steam boiler for the proposed project. CHP is an approach to generating electric power and useful thermal energy from a single fuel source. Instead of purchasing electricity from the distribution grid and separately burning fuel in an on-site furnace or boiler to produce thermal energy, an industrial or commercial facility can use CHP to provide both services in one, energy-efficient step (U.S. Department of Energy 2016).</p> <p>The steam boiler identified for the proposed project is a heat recovery boiler that produces steam at the desired pressure for the process usage. Refinery process equipment must be operated at elevated pressures and temperatures in order to achieve the desired chemical reactions. Each individual process has its own temperature and pressure requirements. The use of CHP to produce additional power would decrease the steam pressure and require additional energy input or compression to raise the steam pressure back up to the level required by the refinery processes. Waste heat from the steam boiler would be directed to the heat recovery section of the boiler and used elsewhere within the refinery processes to potentially reduce combustion in other process heaters. Additional information regarding the applicability</p>

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			<p>of a CHP system at the refinery is provided in Section 3.2 of this Final EIS.</p> <p>The heating values of the new equipment are available in the attachments of Tesoro's PSD Air Permit Application sent to Ecology. The values for the steam boiler were used in this analysis to compare the technology alternatives discussed in Section 3.2 of this Final EIS. The amount of heat energy for the steam boiler and MVEC used in the analysis are 584 MMBtu/hr for the steam boiler and 120 MMBtu/hr for the MVEC.</p>
Ch02-048	Suzanne Butler	<p>I support the elements of Tesoro's proposal to comply with Clean Air Act requirements and reduce the sulfur content of their fuels. I urge that the Final Environmental Impact Statement (FEIS) consider an alternative project that includes the production of lower sulfur fuels and the clean air components of the project without the production and export of mixed xylenes.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-049	Natasha Meskew	Re-invest in clean and sustainable power and do it now.	Thank you for your comment.
Ch02-050	Elisabeth Robson	<p>How about instead of building a refinery for toxic fossil fuel derived substances that could potentially destroy the beauty and the wildlife and the sustainability of this area, we invest our money into creating jobs and infrastructure for a renewable energy future? If we did that, we would be leading the way in the United States, and show that we can create jobs and a future in the renewable economy, which China is currently beating us at by a long shot. Do we want to be left behind, and left out of the future?</p>	Thank you for your comment.

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		To remain competitive and to protect our beautiful and unique ecosystem (as well as jobs and real estate values) we MUST STOP investing in toxic fossil fuels and refineries, and we MUST START investing in the renewable future.	
Ch02-051	Glen Bruels	As I noted, it doesn't appear that the risk is associated with the necessary infrastructure upgrades to keep us compliant with federal fuel standards.	Thank you for your comment.
Ch02-052	Skagit Audubon Society, Timothy Manns	<p>11. Finally, we feel the draft EIS does not examine an adequate range of alternatives.</p> <p>It would be appropriate with this multi-part project to have more than a no-action and a full-implementation alternative. We suggest analysis of a third alternative describing building the parts of the project to reduce sulfur content of fuels but not the xylene production facilities. This would seem a reasonable alternative as defined in the SEPA Handbook at 3.3.2. Such an alternative would offer benefits for the environment and for human health and safety while avoiding some of serious potential problems with production and shipping of xylenes and reformate.</p>	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS. Additional information on technology alternatives is described in Section 3.2 of this Final EIS.
Ch02-053	Carolyn Gastellum	<p>Please consider as a stand alone alternative only permitting the Project components to produce low sulfur fuels. I request an analysis of impacts from just the low sulfur fuels upgrade without the xylene processing and shipment components.</p> <p>There are two components stated in the official project description: One removes additional sulfur during the refining process and installs a special unit to transform hydrocarbons into higher-octane gasoline components for blending. This would</p>	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed

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		<p>actually reduce greenhouse gas pollution and reduce toxic emissions into the air.</p> <p>The other component is for the production of xylene, which would create the significant cumulative adverse impacts of adding 380,000 MTY of greenhouse gases. The Dept. of Ecology considers 25,000 MTY to be significant meaning “more than moderately harmful to the atmosphere, water, air, soil, human and non-human life.”</p> <p>Because of the dangers of toxic xylene emissions, spills, leaks, and unexpected releases and greenhouse gas emissions from the Tesoro Refinery to human health and to our air, marine environments, fresh water, and our soils I request as a stand alone alternative only permitting the project components to produce low sulfur fuels with all the accompanying improvements from new air quality control systems including the naptha hydrotreater and a new Isomerization Unit.</p>	<p>action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS. Additional information on technology alternatives is described in Section 3.2 of this Final EIS.</p>
Ch02-054	Sustainable Connections, Opportunity Council, Jeff Aslan, Ross Quigley	<p>However, one alternative that was not considered by the DEIS for BACT for this project is combined heat and power (CHP) instead of a boiler to produce electricity, heat and steam needed for the project. CHP would have a significant greenhouse gas reduction over a thermal boiler and grid-supplied electricity by pairing efficient electrical production alongside use of the waste heat from power generation for heat and steam that could be used for industrial processes. This BACT proposal would also benefit Tesoro by significantly reducing electric usage and demand charges over the long run. The final EIS should include an analysis of the feasibility and GHG reduction achieved by using a CHP system instead of a conventional boiler.</p>	<p>The steam boiler identified for the proposed project is a heat recovery boiler that produces steam at the desired pressure for the process usage. The use of a CHP would decrease the steam pressure and require additional energy input or compression to raise the steam pressure back up to the required level. Waste heat from the steam boiler would be directed to the heat recovery section of the boiler and would be used elsewhere to potentially reduce combustion in other process heaters. Additional information regarding the applicability of a combined heat and power system at the refinery is provided in Section 3.2 of this Final EIS.</p>
Ch02-055	Anne Winkes	<p>Alternative action:</p> <p>1) The final EIS must deny the xylene production and distribution aspect of the proposed CPUP. This alternative action was not considered in the DEIS but must be considered in the FEIS.</p>	<p>One of the purposes of SEPA is to inform the decision-making process. As described in WAC 197-11-400, “an EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.” And, as described in WAC 197-11-448, “an environmental impact</p>

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			statement analyzes environmental impacts and must be used by agency decision makers, along with other relevant considerations or documents, in making final decisions on a proposal.”
Ch02-056	Swinomish Indian Tribal Community, Larry Wasserman	Swinomish also requests that Skagit County withdraw the draft EIS until it has expanded the review to include an analysis of alternative ports where xylene could be produced and exported. This port is situated in the middle of the Swinomish Tribe's most productive fishing grounds. We believe an alternative site should be located and analyzed as required by SEPA.	Tesoro, the project proponent, selected the site of this proposed project, which includes additions and upgrades to their existing Anacortes refinery. The proposed project location is described in Section 2.3 of the Draft EIS. Siting considerations for individual components, as described by Tesoro, are discussed in Section 2.9.2 of the Draft EIS. As described in WAC 197-11-440 (5)(d), “when a proposal is for a private project on a specific site, the lead agency shall be required to evaluate only the no action alternative plus other reasonable alternatives for achieving the proposal's objective on the same site.” Therefore, an analysis of alternative ports for the proposed project was not considered in this EIS.
Ch02-057	San Juan County Council, Jamie Stephens, Bill Watson	We support Tesoro's proposed Project components for the production of lower sulfur fuels. However, the DEIS does not demonstrate that Tesoro is prepared to safely manufacture and export xylene and we strongly oppose these components of the Project. The impacts to San Juan County from this proposal to manufacture and export xylene, which is a highly volatile hazardous and noxious substance, clearly demonstrate that this Project should not be permitted as proposed. We ask that the FEIS be required to include the reasonable alternative to proceed with the proposed Project components to produce lower sulfur fuels only (and not the Project components to produce and export xylene).	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS. Additional information on technology alternatives are described in Section 3.2 of this Final EIS.
Ch02-058	Ruth Holder, Phillip	E. Alternatives Considered	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes

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	Holder	<p>The DEIS fails to consider a range of a reasonable alternatives in contravention of SEPA, WAC 197-11-786 (“Reasonable alternative’ means an action that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.”); WAC 197-11-440(5); SEPA Online Handbook §3.3.2. Among other things, WAC 197-11-440(5)(vii) includes a specific reference to the permitting agencies’ role as trustee for the public trust when it proposes alternative courses of action. (“The agency perspective should be that each generation is, in effect, a trustee of the environment for succeeding generations.”) Without explanation or justification, the DEIS includes only a thumbs up or a thumbs down approach – a no action alternative or full steam ahead on the entire CPUP including the new mixed xylenes project. In fact, the CPUP is two distinct projects with the xylenes project requiring a significant number of new process units and materials. The purposes for each project 1.) to deliver cleaner transportation fuels and 2.) to produce a new product, are markedly different and unrelated; either project could stand alone.</p> <p>As noted above, the project to produce mixed xylenes for overseas markets would transform Tesoro’s fuels refining facility into a petrochemical plant. Improving Tesoro’s capability to produce lower sulfur transportation fuel for the U.S. market would not change the nature of the refinery, however. We note that recognizing the size, significance, and environmental impacts of the mixed xylenes production and export project, the City of LaConner has called for a separate EIS on it. Cauvel, K. La Conner officials: Xylene production warrants own EIS. Skagit Valley Herald. May 5, 2017. http://www.goskagit.com/news/laconner-officials-xylene-production-warrants-own-eis/article_03ed2714-115e-5975-8359-e782585f22be.html. Accessed May, 2017; Comment on DEIS submitted by Town of LaConner on April 27, 2017. Particularly in light of its duty as trustee of the public trust, Skagit County Planning and Development Services must require the FEIS to include an alternative to proceed with the proposed project components to produce lower sulfur fuels only (without the proposed project components to manufacture and export</p>	<p>production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786).</p> <p>Tesoro considered a number of potential alternatives for the design of the proposed project. The alternatives were eliminated from further analysis because they did not meet the objectives of the proposed project and/or one of the two alternatives criteria. A discussion of alternatives considered by Tesoro is included in Section 2.9 of the Draft EIS. Additional information on technology alternatives is described in Section 3.2 of this Final EIS.</p> <p>Aromatics recovery using an ARU has been identified as a refinery process for many years since these compounds provide multiple roles in fuel blend productions. The removal and export of intermediates and byproducts does not make a refinery into a petrochemical plant. The rate of xylene production at 15,000 barrels per day is small in comparison to the refinery’s fuel production. Production of mixed xylenes does not make a refinery into a petrochemical plant. In the USEPA’s Profile of Petroleum Refining (1995), the products identified for this industry fall into three categories: fuels, non-fuel products, and chemical industry feedstocks. Xylene is specifically listed as a chemical industry feedstock that is produced by refineries.</p>

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		mixed xylenes).	
Ch02-059	Virginia Wolff	<p>Alternatives to the CPUP project As an alternative to this current proposal, the DEIS should consider an analysis of the low sulfur fuel production upgrade without the xylene processing and shipment components. The production of cleaner fuel would enable Tesoro to comply with new laws requiring lower sulfur fuel in a business they know well. The production of mixed xylenes is an entirely new business involving toxic chemicals and increased marine shipping, being undertaken by a refinery with a questionable safety record.</p> <p>Conclusions I support only the elements of Tesoro's CPUP proposal that comply with the Clean Air Act in facilitating production of lower sulfur fuels, without the production and export of xylene.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS. Additional information on technology alternatives are described in Section 3.2 of this Final EIS.</p>
Ch02-060	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for	<p>However, the undersigned are profoundly concerned that the DEIS fails to consider appropriate alternatives.</p>	<p>Thank you for your comment.</p>

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	Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge		
Ch02-061	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>Lack of Alternatives</p> <p>Reasonable Alternatives are Required</p> <p>SEPA requires that an EIS contain a detailed discussion of alternatives to the proposed action (RCW 43.21C.030(c)(iii)). SEPA’s regulations provide that an EIS must consider as alternatives those “actions that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.” WAC § 197–11–440(5)(b). The discussion of alternatives in an EIS need not be exhaustive, but the EIS must present sufficient information for a reasoned choice among alternatives. Toandos Peninsula Ass’n v. Jefferson Cy., 32 Wash. App. 473, 483 (1982).</p> <p>The DEIS Fails to Review Any Reasonable Alternatives</p> <p>The DEIS simply fails to comply with SEPA in its consideration of reasonable alternatives. The DEIS analyzes only two options: the company’s proposal and a noaction alternative. An EIS for a private project on a specific site must consider a “no action alternative plus other reasonable alternatives for achieving the proposal’s objective on the same site.” WAC § 197–11–440(5)(d); Weyerhaeuser v. Pierce Cnty., 124 Wn.2d 26, 39 (1994).</p> <p>While components of the project bring clear benefits to reduce source emissions through marine vapor controls and produce lowersulfur fuel products, the production and export of mixed xylenes will bring significant risks and impacts. The Marine Vapor Emissions Control (MVEC) has been aggregated with the Aromatics Recovery Unit (ARU), storage tanks and the Isomerization unit to offset the source impact from Volatile Organic Compounds (VOC) and other pollutants, so as to ensure net impacts stay below regulatory limits. The Naptha</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786).</p> <p>Tesoro considered a number of potential alternatives for the design of the proposed project. The alternatives were eliminated from further analysis because they did not meet the objectives of the proposed project and/or one of the two alternatives criteria. A discussion of alternatives considered by Tesoro is included in Section 2.9 of the Draft EIS. Additional information on technology alternatives is described in Section 3.2 of this Final EIS.</p>

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		<p>Hydrotreater upgrade (NHT) is necessary for Tesoro to comply with EPA’s Tier 3 standards for gasoline, and has been aggregated with the expansions for xylenes production so that the project as a whole can be dubiously referred to as a “Clean Products Upgrade.”</p> <p>Additional reasonable alternatives must be analyzed in a supplemental draft environmental impact statement of the DEIS or in the FEIS in order to comply with SEPA. We strongly urge that at least one of the alternatives considered include the clean air upgrades (NHT and MVEC) without inclusion of the facilities necessary for manufacturing and exporting xylenes (aromatics recovery and storage). There appears to be only tangential relationship between these projects, and no reason that these projects would be treated as a single unit for purposes of permitting. The combination of the two in the DEIS creates unnecessary confusion and should be corrected.</p>	
Ch02-062	Tesoro Anacortes Refinery, Rebecca Spurling	<p>A. Introduction:</p> <p>When permitted and constructed, the CPUP will improve the Tesoro Anacortes Refinery’s capability to deliver cleaner transportation fuel, in compliance with the U.S. Environmental Protection Agency’s (EPA) Tier 3 Sulfur Standards and to produce a new product, mixed xylenes, which will diversify the Refinery’s product mix and increase its long-term economic viability. Tesoro’s objectives are stated in the Purpose and Need section of the DE IS at 1-4. To achieve these objectives, the CPUP includes project components to produce lower sulfur fuels (an expanded Naphtha Hydrotreater and a new Isomerization Unit), and project components to produce xylenes (an aromatics recovery unit , a steam boiler, a Marine Vapor Emission Control System (MVEC), and three new storage tanks). These components are described generally on page 2-3 of the DEIS and their benefits and impacts are examined more closely throughout the DEIS. The DEIS describes no alternatives, other than the no action alternative, to meet Tesoro’s objectives. This is consistent with and, in fact, mandated by SEPA regulations, because there is no reasonable</p>	Thank you for your comment.

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		alternative that meets all of the project objectives other than Tesoro's proposed action. ¹	
Ch02-063	Evergreen Islands	<p>RECOMMENDATIONS</p> <p>Evergreen Islands recommends that Skagit County pursue the following options to preclude significant adverse environmental impacts due to the exporting crude oil from Tesoro Anacortes refinery on March Point:</p> <ul style="list-style-type: none"> • Divide the DEIS into two parts: <ul style="list-style-type: none"> o One part for the Aromatics Recovery Unit (ARU) for production of mixed xylenes and the Marine Vapor Emissions Control (MVEC) system that will reduce emissions of volatile organic compounds from marine vessels during loading operations. o Another part for the Naphtha Hydrotreater (NHT) and the Isomerization (Isom) Unit to increase the amount of octane available to the refinery. 	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-064	Evergreen Islands	<ul style="list-style-type: none"> • Will reasonable alternatives to the proposed project be considered, including consideration of alternative sites, alternative transportation routes, and alternative sources of energy? 	<p>Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.</p>
Ch02-065	Orca Network, Howard Garrett	<p>We ask that the Final Environmental Impact Statement include:</p> <ul style="list-style-type: none"> • A project alternative that includes only the production of low-sulphur fuels (not the production and export of xylene). 	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA</p>

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			<p>as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS. Additional information on technology alternatives is described in Section 3.2 of this Final EIS.</p>
Ch02-066	Anne Winkes	<p>Alternative action: The final EIS must deny the xylene production and distribution aspect of the proposed CPUP at the Tesoro plant as it cannot ensure the safety and health of workers who will be exposed to xylene on a regular basis. This alternative action was not considered in the DEIS, but must be considered in the FEIS.</p>	<p>One of the purposes of SEPA is to inform the decision-making process. As described in WAC 197-11-400, "an EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality." And, as described in WAC 197-11-448, "an environmental impact statement analyzes environmental impacts and must be used by agency decision makers, along with other relevant considerations or documents, in making final decisions on a proposal."</p>
Ch02-067	Christa Simmons	<p>The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed. I only support the elements of Tesoro's proposal to comply with Clean Air Act requirements and reduce the sulfur content of their fuels.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>

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Ch02-068	Dawn D'Haeze	Invest in renewable energy solutions and scrap your refineries.	Thank you for your comment.
Ch02-069	Michael Godwin	<p>I ask that the Final Environmental Impact Statement include:</p> <ul style="list-style-type: none"> • A project alternative that includes only the creation of low-sulfur fuels (No products or export of xylene) 	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-070	Sally Stapp-Brigham	<p>I'm proposing that Tesla Corporation come to you (Skagit County) and make a proposal to use the pre-existing infrastructure to build their lithium-ion battery facility.</p> <p>Theses factories create upwards of 2000 full time jobs. That's more than two times the amount of full time jobs the refineries provide currently</p> <p>.</p> <p>We need to make investment for future generations and consider the best interests of the Anacortes Community.</p>	Thank you for your comment.
Ch02-071	Tony Idczak	<p>When they come up with a proposal to spend the same amount of money and effort to seek a permit to build renewable wind and solar capacity, to provide clean power to the local residents, I will be the first to stand up and cheer. In the mean time, I won't hold my breath.</p>	Thank you for your comment.
Ch02-072	Deejah Sherman-Peterson, Ron	<p>We support Tesoro's proposed reduction of sulfur in their fuels but definitely DO NOT SUPPORT their proposal to manufacture</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes</p>

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	Sherman-Peterson	and export xylene. These two proposals are very different from one another and shouldn't even be coupled together in the same proposal.	production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-073	Susan Lamb	I think that the xylene production proposed needs to be examined separately. The safety issues are huge and are not adequately stated nor addressed.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-074	Ben Bama	I am writing in opposition of the xylene and reformat portion of Tesoro's project. As a full time resident of San Juan Island, I am especially concerned about the potential impacts of this combined proposal. I support Tesoro's move to producing low sulfur fuels, but firmly believe the two projects should not be bundled together.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action

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			<p>alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-075	Camille Meehan	<p>I ask that your final EIS include the following as well as address any of my comments above:</p> <p>...</p> <ul style="list-style-type: none"> • A project alternative that includes only the creation of low-sulfur fuels (No products or export of xylene) 	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-076	Sigrid Asmus	<p>Tesoro's proposed project is not a single one but two very different projects. For the purposes of this DEIS, they must not be joined together, but for each the full extent of the threat they represent to our Northwest environment must be considered separately. I only support the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section</p>

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			2.9 of the Draft EIS.
Ch02-077	Sigrid Asmus	<p>It is imperative that all the matters listed below be included in and considered by those drafting the DEIS:</p> <p>-- Give first consideration only to a project alternative that mandates the production of nothing but lower-sulfur fuels, and fully preserves and extends the clean-air components of the project (without the production and export of xylenes);</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-078	Sigrid Asmus	<p>Tesoro's proposed project is really two different projects joined together which must instead be considered separately. To proceed otherwise would give Kinder Morgan, known for its unaccountability to environmental protection, an unacceptable free ride at our cost.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-079	Sally Stapp-Brigham	<p>This comment was made in response to the EIS (Environmental Impact Study), required before Tesaro can get the necessary permits to build a Xylene Extraction Plant. They will take sulfur out of the gasoline they refine from the crude oil that arrives by</p>	<p>Thank you for your comment.</p>

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		<p>train. Tesero calls this project their “Clean Products Upgrade” because it of the sulfur removal.</p> <p>A young man read this spectacularly thoughtful suggestion for a much cleaner proposal. I second his responsible thinking.</p>	
Ch02-080	Christine Leonard	I only support the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels.	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-081	Anne Winkes	<p>Partial Action Alternative: Deny the xylene production and distribution aspect of the proposed CPUP but allow the lower sulfur content of gasoline component.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>

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Ch02-082	Claudia Ross-Kuhn	Besides which we all prefer clean energy, The threats to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed. I only support the elements of Tesoro's proposal to comply with Clean Air Act requirements and reduce the sulfur content of their fuels.	Thank you for your comment.
Ch02-083	Joseph Mabel	I support the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels, but the rest of this should be stopped. There should be a project alternative that only includes the production of lower sulfur fuels and the clean air components of the project (without the production and export of xylenes).	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-084	Bob Zeigler	Could there be an alternative that includes process to just remove sulfur per USEPA requirements and not expand xylene production? I recommend that be the preferred alternative.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.

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Ch02-085	David Frome	I only support the elements of Tesoro's proposal to comply with Clean Air Act requirements and reduce the sulfur content of their fuels.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-086	Barbara Tuttle	I agree with the La Conner Town Council that the concerns about xylene mandate their own EIS.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-087	Sanford Olson	I support Tesoro's proposed Project components for the production of lower sulfur fuels. However, the DEIS does not demonstrate that Tesoro is prepared to safely manufacture and export xylene and I strongly oppose these components of the Project. Because of the potential impacts to San Juan County from this proposal to manufacture and export xylene, a highly	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks,

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		<p>volatile hazardous and toxic substance, clearly demonstrate that this Project should not be permitted as proposed. I ask that the FEIS be required to include the reasonable alternative to only proceed with the proposed Project components to produce lower sulfur fuels, not the Project components to produce and export xylene.</p>	<p>diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-088	Stephen Bailey	<p>I BELIEVE THAT YOUR DEPT. SHOULD BE RACKING YOUR BRAINS FOR A PLAN/PLANS THAT WOULD GIVE TESORO A F A I R - AMOUNT OF SUPPORT FOR INITIATING A PROJECT AT LEAST AS FINANCIALLY BIG AS TESORO'S PRESENT PROJECT, IN CREATING A NON-COMBUSTION ENERGY FACILITY IN OUR STATE IN EXCHANGE FOR THEIR CANCELLING EFFORTS FOR FOSSIL FUEL PRODUCTS MANUFACTURE AND TRANSPORTING.</p> <p>THIS CAN BE DONE, I FEEL CERTAIN, WITH CREATIVITY, EXHAUSTIVE DATA GATHERING RE ALL ASPECTS OF SUCH AN EVOLUTION, CONSIDERATIONS OPEN, TRANSPARENT, AND INCLUSIVE OF FULL PUBLIC ACCESS AND FEEDBACK.</p> <p>THIS CAN BE DONE, I FEEL CERTAIN, AS A WIN-WIN-WIN-WIN!!</p> <p>GOD KNOWS WE HAVE GIVEN THEM BILLIONS IN GOVERNMENT WELFARE FOR DECADES NOW, AND LOST, LOST, LOST! WE ARE GOING TO BE MANY DECADES IN BATTLING TO SURVIVE THE CATAclysmic CONSEQUENCES OF OUR "LOSING" POISONING AND DESTRUCTION OF SO MUCH OF OUR LANDS, WATER SYSTEMS, AND ECOSYSTEMS--WHY NOT USE THAT MONEY TO CREATE THE TRANSITION????</p>	<p>Thank you for your comment.</p>
Ch02-089	Jack Stansfield	<p>As a lifelong resident of the Puget Sound area, I support only the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels.</p>	<p>Thank you for your comment.</p>
Ch02-090	Edward Chadd	<p>As you continue the environmental review, please ensure that the Final EIS considers a project alternative that only includes this</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of</p>

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		clean-air provision.	the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-091	Charles Rapport	The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed. I only support the elements of Tesoro’s proposal to comply with Clean Air Act requirements and reduce the sulfur content of their fuels.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-092	C Isbell	Solar Power and Wind Power for goodness sake!!!! Dinosaur fuels for dinosaur company is just NOT GOOD BUSINESS. Think about it.	Thank you for your comment.
Ch02-093	Kathryn Trueblood	I am sympathetic to the need for high wage family jobs, but let's bring on alternative energy industries, because that is what the future looks like, not more highly volatile, hazardous, and noxious substances	Thank you for your comment.

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Ch02-094	Kate Szurek	Wake up and only do what is within the requirements of the Clean Air Act.	Thank you for your comment.
Ch02-095	Sandy Rabinowitz	I applaud Tesoro's intention to produce lower sulfur fuels, and encourage them to separate this from their plan to move xylene around the Salish Sea area.	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p>
Ch02-096	Val Veirs	My request is for a complete Final Environmental Impact Statement. I ask that Tesoro only produce low-sulphur fuels and that greenhouse gas emissions from the project be carefully recorded.	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and the Washington State Department of</p>

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			Ecology. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.
Ch02-097	Joan Poor	Please assure that the final EIS provides a project alternative that includes only the production of low-sulphur fuels, ...	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-098	Gay Wilmerding	Reconsider adverse outcomes of xylene production and invest in renewables, in the future, not the past.	Thank you for your comment.
Ch02-099	Randall Collins	I do support the elements of Tesoro's proposal that are necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels, but this should be considered a separate project from the xylene project.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at

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			a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-100	Howard Cherrington	I only support the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels, not the production for export or transport of any kind.	Thank you for your comment.
Ch02-101	Alexander McIntyre	I believe we need to be investing in renewable and green energy and in projects that are more equitable for our environment at large.	Thank you for your comment.
Ch02-102	Rachel Molloy	We need to be building and investing in green energy economy infrastructure and green community jobs...not more fossil fuel industry that has lower job numbers, higher pollution detriments to our communities, and higher emission outputs.	Thank you for your comment.
Ch02-103	David Parker	Tesoro should of course make every effort to comply with the CAA. But no expansion.	Thank you for your comment.
Ch02-104	Janet Weedman	I only support the proposed elements necessary to comply with Clean Air Act requirements reducing sulfur content of their fuels.	Thank you for your comment.
Ch02-105	Stephen Shubert	I object to the approval of a poisonous production of Xylene, but agree that taking the sulfur from gasoline is a worthwhile project.	Thank you for your comment.
Ch02-106	Iris Graville	I have serious concerns about the “Clean Products Upgrade Project.” I support only the project’s proposed upgrade to produce fuels with lower sulfur content, but I strongly oppose the unclean part: xylene, the other toxic materials used in its manufacture, and the increased tank vessel traffic that raises the risk of an oil spill — or worse — a xylene spill.	Thank you for your comment.
Ch02-107	Jane Wentworth	I am writing to express my concerns about the proposed expansion of Tesoro’s refinery to manufacture and export Xylene. I support the production of the manufacturing of low-sulfur fuels.	Thank you for your comment.

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Ch02-108	Caroline Armon	Named the “Clean Products Upgrade Project”, the only “clean” thing is Tesoro’s proposed upgrade to produce fuels with lower sulfur content. Support is for this part of the project only, but strongly oppose the unclean part: xylene, the other toxic materials used in its manufacture, and the increased tank vessel traffic that increases the risk of an oil spill — or worse — a xylene spill.	Thank you for your comment.
Ch02-109	L Adams	I fail to understand why we should waste taxpayer money funding infrastructure for a dirty & fortunately dying energy system instead of taking care of bringing America back into the lead on clean renewable energy instead. The area would be better suited to wave energy.	Thank you for your comment.
Ch02-110	Alyson Yarus	We should be encouraging our energy suppliers to look toward the future instead of the past!~	Thank you for your comment.
Ch02-111	Peggy Bridgman	Tesoro is really intending to do two different things: to reduce sulfur in the fuel they refine, and to produce xylene. Each of these proposals needs its own EIS.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-112	Lisa Hogan	These waters are already fragile, and we know that the age of fossil fuels has come to an end. Let's be wise and invest our money and resources in ways that will actually help the planet (there is no planet B), rather than investing even more to our	Thank you for your comment.

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		ultimate downfall.	
Ch02-113	Lisa Dahill	<p>As many scientists are showing very convincingly, we need to shift from a fossil-fuel-based economy to a green economy as quickly as possible. Expanding fossil fuel capacity therefore does not serve the public good, let alone future generations and a habitable planet.</p> <p>Please invest instead in technologies that support alternative energy for the region and for the sake of all those yet to be born.</p>	Thank you for your comment.
Ch02-114	R Peterson	It's past time to focus on alternative forms of energy - like the rest of the civilized world is doing . The longer we delay ridding the world of pollutant-energy sources, the quicker we reach the point of no return on permanent damage to the planet.	Thank you for your comment.
Ch02-115	Steven Smith	Hey, get with it, you are living in yesterday's world; we need to vastly increase sustainable energy production and usage, and vastly decrease petroleum and coal - based energy production.	Thank you for your comment.
Ch02-116	Dena Turner	This project must be turned down and renewables must be promoted in order to protect the planet for future generations.	Thank you for your comment.
Ch02-117	Luba Pekisheva	Please reject Tesoro Refinery's proposed expansion project and comply with Clean Air Act requirements.	Thank you for your comment.
Ch02-118	Glen Anderson	<p>REJECT THE PROPOSAL.</p> <p>Actually, reject BOTH of the separate proposals. Do NOT consider them as two parts of one proposal.</p> <p>WE MUST COMPLY with Clean Air Act requirements and reduce sulfur content of their fuels.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental</p>

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			degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.
Ch02-119	Deborah Colotti	Renewable energy is the future. STOP building towards DIRTY energy. Stay CLEAN!!	Thank you for your comment.
Ch02-120	Theodora Tsongas	We must use our resources to develop and promote clean and sustainable renewable resources.	Thank you for your comment.
Ch02-121	Sue O'Donnell	...the XYLENE part of the project needs to be denied.	Thank you for your comment.
Ch02-122	Susan Woods	The Anacortes facility already emits pollution. It is my understanding that within your proposal there are supposed to be emissions improvements made. I am very much in favor of any improvement you would make in emissions that would increase our health and safety. I hope that the further improvement is not tied to the acceptance of xylene manufacture.	Thank you for your comment.
Ch02-123	Beverly Faxon	I understand that the xylene proposal is part of a larger proposal that includes the production of low-sulfur fuels. Low sulfur-fuels seem to successfully fit the requirement of mitigating the environmental impact of the fossil fuel industry. Tesoro should go with this alternative only and not attach it to xylene production—thus simply compounding rather than mitigating the impact of fossil fuel production and use.	The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.

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Ch02-124	Sue O'Donnell	I only support the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of the fuel manufactured at this refinery.	Thank you for your comment.
Ch02-125	Mark Burris	I support the proposed ability to meet USEPA Tier 3 Reduced Sulfur Fuel standards.	Thank you for your comment.
Ch02-126	Liz Spoerri	The project would increase our national production of Xylene 9% and would mean the shipment of 5.5 million barrels per year, 1500 per day.	Thank you for your comment.
Ch02-127	Robert Bojorquez	Xylene is a flammable petrochemical used to make plastic and synthetic materials that would be shipped to China.	Thank you for your comment.
Ch02-128	Phyllis Dolph	I think the DEIS may not have analyzed the demand for or the need for the sudden surge in xylene in the United States. I suggest that a market analysis be done to see if this is really needed. Shipping xylene to Asia to be made into plastics etc? Are they going to use them? All the bunker fuel, the risk of spills, the threats to our sensitive marine environment, the noise which harms whales' sonar communication.....all for extra xylene? Where is this expanded market coming from? I hope the EIS will examine this and find it is out of touch with the reality of our world.	"SEPA contemplates that the general welfare, social, economic, and other requirements and essential considerations of state policy will be taken into account in weighing and balancing alternatives and in making final decisions. However, the environmental impact statement is not required to evaluate and document all of the possible effects and considerations of a decision or to contain the balancing judgments that must ultimately be made by the decision makers. Rather, an environmental impact statement analyzes environmental impacts and must be used by agency decision makers, along with other relevant considerations or documents, in making final decisions on a proposal" (WAC 197-11-448).
Ch02-129	Jeremy Bosworth	Hello, I grew up in Anacortes (1-18years) and four years ago moved back. I now live & work at the top of Padilla Heights just down wind less than a mile from the Refineries... within a few days of signing my lease I noticed the smell of heavy oil burning in the air when the wind was blowing my way. I have since learned that is from the burnt coke/catalyst that is 90% scrubbed from the cat crackers in the main plume. (Why is this allowed when there are higher quality scrubbers (electrostatic) available?) This occasional smell of oil has made me question if there are air monitors at higher elevations surrounding the refineries? and	The smell of heavy oil burning from the fluid catalytic cracker at the refinery is not part of the proposed project and therefore is not discussed in the Draft EIS. Fenceline air quality monitors have been installed at the Tesoro Anacortes Refinery and a pilot project has been performed in preparation for 2018 when the USEPA will require fenceline air quality monitoring. As hydrocarbons are heavier than air, ground level fenceline monitors are expected to identify worst-case locations for emission leaks. NWCAA has an air quality monitoring station located to the south of the refinery that has a slightly elevated location, but no monitors are located in the

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		if not, why not?	<p>Padilla Heights area at this time.</p> <p>The air modeling analysis presented in Section 4.4.2.1 of the Draft EIS found that the proposed project itself would not result in exceedances of air pollutants above the existing air quality standards within the air shed, which includes the Swinomish Reservation as well as the higher elevations of the Padilla Heights area. Historically, the area of influence surrounding the refinery has not been a nonattainment or maintenance area; the air quality has met the federal and state standards, except for cases (e.g., local meteorological conditions such as an inversion) where an exceptional event may have caused a short period of exceptionally poor air quality. Additional information regarding agencies responsible for regulating the air emissions and odors is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch02-130	Frank Salseina	This proposal is keeping within the established footprint and will not need any expansive added space.	Thank you for your comment.
Ch02-131	Karen McCallum	<p>Is Xylene already a byproduct of the petroleum process? If so, what do they do with it now?</p> <p>Does Tesoro have any proposals to develop alternative Earth safe Energy sources in light of the finite oil stores, global warming, toxic waste issues, etc. that are related to petroleum production?</p>	<p>Xylene is a component of gasoline produced at the refinery. The refinery would switch some of its production of gasoline to producing xylenes (see Section 4.4 of the Draft EIS). The proposed project would remove a portion of fuel production within the refinery and convert it into xylene production (a chemical feedstock). Development of a project that would generate alternative energy does not meet the objectives of the proposed project (see Section 1.2 of the Draft EIS). The SEPA Rules (WAC 197-11-402(1)) require the lead agency to analyze reasonable alternatives when preparing an EIS. Reasonable alternatives are defined as actions that could feasibly attain or approximate a proposal's objectives (WAC 197-11-786).</p>
Ch02-132	Dan Cameron	In addition this [project] will provide the Refinery the ability to produce a Xylene product as an export product.	Thank you for your comment.
Ch02-133	Teresa Dix	Please make sure every precaution is taken concerning the environment, water, land and air.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch02-134	Anonymous	The clean products description is a classic misdirection.	The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.
Ch02-135	Bob Hall	2. The DEIS failed to explain why the current configuration of the refinery makes it impossible to meet the new standards. This should be included.	The existing NHT at the refinery does not have enough processing capacity to further reduce the sulfur content in gasoline, as required by the USEPA Tier 3 regulations (see Section 2.6.1 of the Draft EIS). The new Isom Unit would process light hydrocarbons to produce a low sulfur, low benzene gasoline blending component to allow the refinery to meet the new clean fuel standards. The Draft EIS discusses the modifications and new equipment necessary to produce gasoline that would meet the new standards in Sections 1.2, 2.6.1, and 2.6.2 and discusses the alternatives considered for reducing the sulfur content of fuels in Section 2.9.1.1.
Ch02-136	Jeff Thibeau	Will Tesoro secure an insurance bond equal to the damage that can/will be caused by this project? If not, who will pay for the damages?	As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and would be required to pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.
Ch02-137	Chuck Hoover	For those of you not familiar with xylene, it's a colorless liquid that we handle every time we put gasoline in our cars or clean paintbrushes. While it's highly flammable, mature storage and transport procedures make it very safe for everyday use.	Thank you for your comment.
Ch02-138	Jane Alynn	Also, the reference to "clean" products is disingenuous. It is not a clean product; it is highly toxic and flammable, and its potential for spills and explosions is a threat to our marine waters, the soil, our drinking water, and our air.	The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.
Ch02-139	Martha Hall	10. We need assurances that the refinery will not increase the amount of crude it brings to its refinery in Anacortes.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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Ch02-140	Martha Hall	13. Is there any assurance that Tesoro will keep production of xylene within the amount that was analyzed in this EIS? If not, there should be.	The proposed project description does not include expansion of the estimated xylene production of 15,000 barrels per day. Production of mixed xylenes greater than 15,000 barrels per day was not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Ch02-141	Sue O'Donnell	I am disturbed by the name of this project: "Clean Products Upgrade"? What is clean about the dirty crude oil being brought here to our once pristine shores and atmosphere?	The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.
Ch02-142	Will Golding	Will the benefits of this project outweighs the costs 25 years from now? 50 years from now? 100 years from now?	SEPA's procedural provisions require the consideration of environmental impacts, including direct, indirect, and cumulative impacts (WAC 197-11-060 (4)). While positive and negative impacts of the proposed project are discussed in the EIS, the lead agency is not required to conduct a formal cost-benefit analysis when preparing an EIS. Rather, "SEPA contemplates that the general welfare, social, economic, and other requirements and essential considerations of state policy will be taken into account in weighing and balancing alternatives and in making final decisions. However, the environmental impact statement is not required to evaluate and document all of the possible effects and considerations of a decision or to contain the balancing judgments that must ultimately be made by the decision makers. Rather, an environmental impact statement analyzes environmental impacts and must be used by agency decision makers, along with other relevant considerations or documents, in making final decisions on a proposal" (WAC 197-11-448).
Ch02-143	Bob Zeigler	The document also states: "The proposed project would require the shipment via truck, of two new chemicals to the refinery, sulfolane and ammonia, and an increase in the shipment of perchloroethylene, already in use." What products would be used to make the xylene product and in what quantities and where will they be coming from and how would they transported to the site? Each year 60 marine vessels will leave the site with xylene but what is the source of the products to make xylene?	<p>The new mixed xylenes would be extracted from reformat, a high octane liquid derived from refining crude oils and commonly used in blending gasoline to get various octane ratings.</p> <p>Reformat includes xylenes as well as other aromatic chemicals such as toluene, trimethylbenzene, ethylbenzene, octane, and isopropylbenzene (see Table 2-1 in Section 2.1 of the Draft EIS).</p> <p>The two new process chemicals, sulfolane and aqueous ammonia, that would be used in the production of the mixed xylenes and the quantities and transportation methods planned for the proposed</p>

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			<p>project are discussed in Section 2.8.3 of the Draft EIS.</p> <p>The other chemicals and feedstocks used for the proposed project, including natural gas and perchloroethylene, are routinely used at the refinery now and do not require substantive changes to existing refinery practices (see Section 2.8.4 of the Draft EIS).</p> <p>The proposed project includes a total of 60 additional vessels per year (approximately 5 per month). Twenty of the vessels would be used for exporting mixed xylenes; 40 vessels would be used to deliver additional reformat to the refinery. The reformat feedstock would be received at the Tesoro Anacortes Refinery by marine vessels transiting from other West Coast refineries. Refinery locations and, therefore, the marine vessel transportation routes, would vary depending on market conditions (see Section 2.8.2 of the Draft EIS).</p>
Ch02-144	Steve Wilhoit	There is a demonstrable need and desire for products like those currently produced and proposed to be produced by Tesoro at March point. The most cost effective and least impactful way to provide them is by modifying existing facilities, using proven procedures and practices and moving products on existing and demonstrably stable corridors.	Thank you for your comment.
Ch02-145	Xochi Rose	This proposed expansion of both scope AND volume of production AND shipment of hydrocarbons is a slippery slope; this process may set legal precedent for future expansions which may not need any oversight at all.	Thank you for your comment.
Ch02-146	Rebecca Durr, Greg Durr	Why locate here?	Tesoro, the project proponent, selected the site of this proposed project which includes additions and upgrades to their existing Anacortes refinery (see Section 2.3 of the Draft EIS). Siting considerations for individual components, as described by Tesoro, are discussed in Section 2.9.2 of the Draft EIS.
Ch02-147	Rebecca Durr, Greg Durr	How necessary is this facility to human beings and the planet? Who will this proposal benefit? Will those who will benefit be the same ones shouldering the risks?	Tesoro's objective for the proposed project is to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix (see

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			<p>Section 1.2 of the Draft EIS).</p> <p>The Draft EIS analyzes beneficial and adverse impacts of the proposed project and the measures being taken to avoid or minimize potential impacts in Chapters 3 through 13. Each chapter of the Draft EIS defines the study area which applies to the beneficial and adverse impacts identified.</p>
Ch02-148	Kathleen Lorence-Flanagan	<p>Some general comments: 1. The name of this project is misleading since it involves 2 parts: additions and upgrades to the current facility to meet federal fuel standards that went into effect January, 2017, and secondly to enable production of 15,000 barrels/day of mixed xylenes. The name ought to be changed to more honestly represent what will be occurring. I doubt the majority of people have ever heard of xylene, nor of the language surrounding it, but as a toxic, easily explosive product, it can hardly be called a "clean product."</p>	<p>The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.</p>
Ch02-149	Washington State Department of Ecology, Meg Bommarito, Yvonne Kicken	<p>1. Xylene does not meet the definition of an oil, per WAC 173-180-025(21); however, reformate does appear to fall within this definition and is described as being stored in the new proposed Tank TK 285. Additionally, Section 2.6.5 on Page 2-19 of the draft document indicates that proposed tanks TK 286 and TK 287 " . . . may also be used for storing gasoline or gasoline blendstock (Tesoro 2016c)." Gasoline and gasoline blendstocks are defined as oils. Therefore, as presently described in the draft EIS, all tanks proposed for the New Tanks Area are subject to the design and construction requirements of WAC 173-180-330. The final EIS should identify and include this requirement.</p>	<p>Storage tank design standards are discussed in this Final EIS in Section 3.2 and all materials associated with the proposed project would be stored in accordance with applicable regulations and the updated SPCC Plan. Specific design requirements outlined in WAC 173-180-330 for new oil storage tanks would be met. Additional information regarding agencies responsible for regulating tank design standards is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch02-150	Ruth Holder, Phillip Holder	<p>II. Mixed Xylenes Production and Export</p> <p>Tesoro proposes to transport a significant amount of petrochemical feedstock to the Tesoro Refinery to be processed into 15,000 barrels a day (over 5 million barrels a year) of mixed xylenes for export. This part of the CPUP would effectively transform the Tesoro's facility from a fuel refinery into a petrochemical plant. This would constitute a major change in</p>	<p>Aromatics recovery using an ARU has been identified as a refinery process for many years as these compounds provide multiple roles in fuel blend productions. The removal and export of intermediates and byproducts does not make a refinery into a petrochemical plant. The rate of xylene production at 15,000 barrels per day is small compared to the refinery's fuel production rate of an average 118,000 barrels per day. In the USEPA's Profile of Petroleum Refining (1995), the products identified for this</p>

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		<p>Tesoro’s business model for the facility; introduce new and expanded equipment and processes; add new and vastly expanded amounts of hazardous chemicals; and present new threats to the environment.</p> <p>The DEIS describes the following new project components needed for the mixed xylenes project: a new aromatics recovery unit (ARU) to produce 15,000 bpd of mixed xylenes; a steam boiler for additional energy needed to run the new process units; a marine vapor emission control (MVEC) system (Dock Safety Unit and Vapor Combustion Unit) to capture vapors during product loading from docked marine vessels, three storage tanks in the New Tanks Area to store reformat and mixed xylenes. DEIS §2.8. DEIS §2.8 also says “[o]peration would increase the use of materials handled at the refinery, and would introduce new materials to be used in the ARU and boiler.” New materials that would be used for the project are sulfolene and aqueous ammonia. The project would significantly increase the amount of natural gas, reformat and perchloroethylene. The mixed xylenes project would also use “other materials and feedstocks” already used at the refinery. These new units and use of new or additional materials would not be necessary in the absence of permits allowing the mixed xylenes portion of the project.</p> <p>According to DEIS §2.8, the mixed xylenes project would cause marine vessel traffic would to increase by approximately 60 vessels calls per year (approximately 5 per month) (this amounts to 120 vessel additional transits to and from the wharf per year). 40 vessels per year would deliver reformat feedstock from other refineries along the west coast. After the reformat is unloaded, these vessels would be loaded with gasoline blendstock (recovered after the mixed xylenes are extracted) that would be backhauled to the original refinery that supplied that reformat feedstock. Articulated Tug Barges (ATBs) would be used to transport reformat to and from the refinery. The remaining 20 vessels (tankships) calling at Tesoro’s wharf structure would be</p>	<p>industry fall into three categories: fuels, non-fuel products, and chemical industry feedstock. Xylene is specifically listed as a chemical industry feedstock, which is produced by refineries.</p> <p>After completion of this Final EIS, Tesoro would need to obtain permits and authorizations to construct and operate the proposed project. A summary of anticipated permits and approvals, and the relevant agencies, is provided in Section 1.4.5 of the Draft EIS. Additional information regarding agencies responsible for regulating various aspects of the proposed project discussed in the Draft EIS and mentioned in comments received is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information about the vessel types and proposed use for each type of vessel for the proposed project is provided in Section 3.9 of this Final EIS.</p> <p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the supporting analysis of impacts in each of the resource chapters.</p>

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		<p>for exporting mixed xylenes to global markets.</p> <p>These dramatic changes to Tesoro’s facility demand a thorough investigation and analysis of any and all probable significant impacts. Unfortunately, the DEIS fails in this regard because it understates, and in some cases ignores, significant impacts; it also neglects to describe, support, or facilitate permit conditions or mitigation measures that would avoid or minimize the potential for adverse impacts. The FEIS must correct all of the deficiencies in the DEIS and recommend permit conditions and mitigations that are critically important to avoid significant adverse impacts. This portion of our Supplemental Comment addresses issues relating to the mixed xylene’s project.</p>	
Ch02-151	Evergreen Islands	<p>The Nexus between Tesoro’s Vancouver Terminal & the Tesoro’s Clean Products Upgrade Project</p> <p>The EFSEC Scoping Notice²⁶ describes Tesoro’s proposed Vancouver Terminal as follows:</p> <p>Tesoro Savage Petroleum Terminal LLC (Applicant) is proposing to construct and operate the Tesoro Savage Vancouver Energy Distribution Terminal (Project). The proposed Project, at full operation, will receive up to an average of 360,000 barrels of crude oil per day from Midwest North America at the Port of Vancouver, WA (Port) in Clark County. Crude oil received by rail will be unloaded on site, stored temporarily, then loaded onto marine vessels at the Project site, primarily for delivery to refineries located on the United States West Coast.</p> <p>Note that Tesoro’s proposed marine terminal at Vancouver and Tesoro’s proposed marine terminal on March Point are conceptually the same – 1) receive an oil product by train, 2) store an oil product, and then 3) export the oil product by tanker or barge.</p> <p>On January 28, 2015, the Washington State Energy Facility Site Evaluation Council (EFSEC) commenced an adjudicative hearing²⁷</p>	Thank you for your comment.

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		<p>related to the Tesoro Savage Application No. 201301 in accordance with the procedural requirements of WAC Chapter 463-30 and Chapter 34-05 RCW. The adjudicative hearings²⁸ will be held in Vancouver from Monday, June 27, 2016 through Friday, July 29, 2016.</p> <p>Since the March Point refinery currently is permitted to import 50,000 bbl/day by oil train and the proposed the Vancouver oil terminal will import 360,000 bbl/day by oil train, the March refinery's potential for exporting crude oil are significantly less (~ 1:7) than the proposed Vancouver oil terminal. However, the March Point refinery receives crude oil from several sources, whose supply may increase in the future.</p>	
Ch02-152	Evergreen Islands	<ul style="list-style-type: none"> • What is the purpose and need for the project? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Ch02-153	Evergreen Islands	<ul style="list-style-type: none"> • What are the impacts at point of resource extraction and/or end use? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Ch02-154	Laurie Sherman	I am concerned that there are no discussions re the potential vs manageable growth/ scale of this refinery project. What does it take to manage a spill, an accident,, what is the impact? are we ready for it? We know it's a terrible idea to increase oil train traffic and start shipping crude oil, in addition to the xylene.	<p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The likelihood of a spill occurring in the Salish Sea is discussed in Section 13.5.6. A summary of potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5.8 of the Draft EIS. Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at

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			<p>the refinery and wharf – Section 2.7.6 and Section 2.8.5</p> <ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformat evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Washington State Department of Ecology, and USEPA. Additional information regarding the agencies responsible for regulating vessel traffic and spill prevention is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch02-155	Anne Winkes	<p>I wish to address Tesoro’s incorrect categorization of the production, marketing and distribution of xylene as part of its work as a refinery. The production, marketing and distribution of xylene is the work of petrochemical plants, not oil refineries.</p> <p>The job of oil refineries is to produce physical and chemical changes in crude oil by a variety of manufacturing processes, including distillation. One of the end products of distillation is naphtha. Tesoro’s proposed Clean Products Upgrade Project (CPUP) includes improvements to its production of naphtha so that</p>	<p>Aromatics recovery using an ARU has been identified as a refinery process for many years since these compounds provide multiple roles in fuel blend productions. The removal and export of intermediates and byproducts does not make a refinery into a petrochemical plant. The rate of xylene production at 15,000 barrels per day is small in comparison to the refinery’s fuel production. In the USEPA’s Profile of Petroleum Refining (1995), the products identified for this industry fall into three categories: fuels, non-fuel products, and chemical industry feedstocks. Xylene is specifically listed as a chemical industry feedstock that is produced by refineries.</p>

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		<p>it can produce gasoline with reduced sulfur content as required by USEPA. I support this component of the CPUP.</p> <p>However, naptha is also the feedstock used for the manufacture of aromatics. The production of aromatics, like xylene, is the purview of petrochemical plants not oil refineries.</p> <p>The final EIS must analysis the direct, indirect and cumulative adverse impacts of Tesoro's Anacortes oil refinery expanding its scope of practice to include the work of a petrochemical plant.</p> <p>The final EIS must examine in depth the differences between the oil industry and the petrochemical manufacturing and distribution industry, including any differences in the federal, state, and local regulations that govern each, and analyze whether Tesoro's Anacortes refinery can function without causing harm to the health, safety and wellbeing of its workers, the surrounding community and the environment, in its proposed new role as a producer, marketer, and distributor of xylene. Such analysis must consider in depth the final findings and recommendations concerning process safety management made by the Chemical Safety and Hazard Investigation Board following the 2010 Anacortes Tesoro Refinery disaster that killed seven workers.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p>
Ch02-156	Xochi Flores Rose	<p>I also have questions about materials shipment. Tesoro would like to produce roughly 750,000 gallons of Xylene per day. How will all of the raw materials be shipped to Tesoro's March Point refinery? How will each barrel of Xylene be transported elsewhere? How many barrels will travel by tanker? How many barrels by rail? How many barrels by truck? What are the risks inherent with each mode of transport?</p>	<p>The proposed project would enable Tesoro to produce an average of 15,000 barrels per day (630,000 gallons; using U.S. petroleum conversion of 42 gallons per barrel) of mixed xylenes (see Sections 2.1 and 2.8 of the Draft EIS).</p> <p>The mixed xylenes would be stored in storage tanks in the New Tanks Area and shipped (exported) approximately two times per month by marine vessel via the existing wharf structure. There are also three additional vessels per month that would deliver reformate to the refinery – a petroleum feedstock used for both gasoline and xylenes production.</p>

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			<p>The Draft EIS discusses modes of transport used for the shipment of materials associated with the proposed project, as well as the export of mixed xylenes, in Chapter 2. Modes of transport for these materials include trucks and marine vessels, and details are included in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vehicle traffic – Section 2.8.1 • Marine vessel traffic – Section 2.8.2 <p>The Draft EIS also discusses the potential impacts that could result from unplanned events associated with spills throughout Chapters 3 through 13. Further detail associated with potential impacts related to truck and marine vessel traffic is included in the following sections:</p> <ul style="list-style-type: none"> • Vehicle traffic safety impacts – Section 9.4.2 • Human health impacts due to land transport spills – Sections 9.6.2.6 • Human health impacts due to marine transport spills and spill response – Sections 9.6.2.4 and 9.6.2.5 • Marine vessel traffic safety impacts – Section 13.4.2 • Marine spills and spill response – Section 13.5
Ch02-157	Bob Zeigler	<p>The document also states: "The proposed project would require the shipment via truck, of two new chemicals to the refinery, sulfolane and ammonia, and an increase in the shipment of perchloroethylene, already in use." What products would be used to make the xylene product and in what quantities and where will they be coming from and how would they transported to the site? Each year 60 marine vessels will leave the site with xylene but what is the source of the products to make xylene?</p>	<p>The new mixed xylenes would be extracted from reformat, a high octane liquid derived from refining crude oils and commonly used in blending gasoline to get various octane ratings.</p> <p>Reformat includes xylenes as well as other aromatic chemicals such as toluene, trimethylbenzene, ethylbenzene, octane, and isopropylbenzene (see Table 2-1 in Section 2.1 of the Draft EIS).</p> <p>The two new process chemicals, sulfolane and aqueous ammonia, that would be used in the production of the mixed xylenes and the quantities and transportation methods planned for the proposed project are discussed in Section 2.8.3 of the Draft EIS.</p> <p>The other chemicals and feedstocks used for the proposed project, including natural gas and perchloroethylene, are routinely used at the refinery now and do not require substantive changes to existing refinery practices (see Section 2.8.4 of the Draft EIS).</p>

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			<p>The proposed project includes a total of 60 additional vessels per year (approximately 5 per month). Twenty of the vessels would be used for exporting mixed xylenes; 40 vessels would be used to deliver additional reformat to the refinery. The reformat feedstock would be received at the Tesoro Anacortes Refinery by marine vessels transiting from other West Coast refineries. Refinery locations and, therefore, the marine vessel transportation routes, would vary depending on market conditions (see Section 2.8.2 of the Draft EIS).</p>
Ch02-158	Phillip Holder	Xylene production represents an effort by Tesoro to "reinvent" itself as petrochemmical plant.	Thank you for your comment.

Chapter 3: Geologic Resources

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Ch03-001	Phyllis Dolph	It [the DEIS] does not adequately include what would happen in the event of an earthquake.	The Draft EIS discusses the potential impacts from earthquakes in Section 3.4.2.1, including potential damage to proposed project infrastructure to an extent that could result in loss of life, or a spill that would impact the environment beyond the developed portion of the refinery. Disruption of local and regional transportation or communications within the study area could also occur as a result of an earthquake, which could hinder emergency response, such as medical response or spill response. Measures to limit the impacts include compliance with the International Building Code for seismic structural requirements.
Ch03-002	Judy Hammer	Earthquakes and petrochemical-storage tanks, let alone Xylene production/storage do not marry well. Please go to: www.earthquakescanada.nrcan.gc.ca and pull up the Western Canada info. This threat is very real for our region of the United States. Seismologists are in agreement: We are overdue for the Big One. From March 27 through April 27, 2017, our neighbors to the IMMEDIATE north had 336 earthquakes. After the Great Japan Quakes of 2011, I began monitoring earthquake activity along the Cascadia Subduction Zone. On the Canadian website, there were NO DOTS indicating earthquakes in our Pacific Northwest region at that time. Now there are HUNDREDS!!! Can you imagine the current refineries would explode.... I am NOT fearmongering here. Earthquakes absolutely need to be factored in. If the Cascadia Subduction Zone snaps, the entire region will be in shambles, given the predictions of the severity of the shaking. How on earth will firefighters, police, EMS, hospitals, etc. possibly absorb the fallout from a Xylene explosion, let alone all the other petrochemicals out at Shell and Tesoro? Anacortes is off the beaten path ... Seattle, Portland, Tacoma will all get attention first. The Dwayne Berentesen [Duane Berentson] Bridge will collapse, if predictions hold true. We all will be stuck on the island, for those without a boat. The roads may be impassable. And we are at the mercy of truly horrific contamination of our air, water, soil. Even if we don't get The Big One, even a 6.0 shake	There is potential for geologic hazards associated with natural events, such as earthquake, tsunami, landslide, or volcanic eruption, to cause damage to proposed project infrastructure. The Draft EIS discusses the potential impacts from earthquakes in Section 3.4.2.1, including potential damage to proposed project infrastructure including whether such an event could result in loss of life, or whether a spill could impact the environment beyond the developed portion of the refinery. Additional information regarding the agencies responsible for regulating seismic structural requirements is provided in Table 2 in Section 3.1 of this Final EIS.

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		<p>could prove catastrophic to a Xylene-facility explosion from earthquake activity. To Tesoro Headquarters: Google “Cascadia Subduction Zone Earthquake Predictions.” Scientists up here and pretty much everywhere will support this statement: The threat is real.</p>	
Ch03-003	Bonnie Miller	<p>Earthquakes damage will wreck havoc on the conditions when transmissions are interrupted.</p>	<p>Thank you for your comment.</p>
Ch03-004	Erika Davis	<p>Many of the other commenters raise important considerations too, such as danger from seismic activity</p>	<p>Thank you for your comment.</p>
Ch03-005	Will Golding	<p>Will this project be impacted by using sea-levels if projections of over 6 feet in rise occur over by 2100?</p> <p>How vulnerable is this project to treats from tsunamis, or earthquakes in this geologically active region?</p> <p>How would this project be impacted by a potential eruption from Mt. Baker?</p>	<p>Topography within the refinery boundary is discussed in Section 3.3.1.2 and the elevation of proposed project components in relation to sea level is discussed in Section 3.4.2.2 of the Draft EIS. Sea level rise in the Puget Sound and the potential impacts to proposed project infrastructure at the refinery are discussed in Section 4.8.1 of the Draft EIS.</p> <p>The Draft EIS discusses geologic hazards, including tsunamis, earthquakes, and volcanic eruptions, and their potential impacts on construction and operation of the proposed project in Section 3.4. Glacier Peak and Mount Baker are the nearest volcanoes to the study area and are discussed in Section 3.4.1.4 of the Draft EIS. Additional information regarding the agencies responsible for regulating seismic structural requirements is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch03-006	Phyllis Dolph	<p>A PhD marine geologist who spoke to the Friends of Skagit Beaches in April, said that we were due for an earthquake. There is NO way to get ready for such a thing. We will have explosions and spills.</p> <p>Please eventually deny this project.</p>	<p>Thank you for your comment.</p>

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Ch03-007	Sara Holahan	<p>ES7.1 Geological Xylene can leak into the soil, surface water or groundwater where it may remain for months or more before it breaks down into other chemicals. The Environmental Protection Agency has identified the most serious hazardous waste sites in the nation, and Xylene has been found in at least 840 of the 1,684 current sites on the national priorities list. Yet the EIS lists the possible geological effects as negligible.</p>	<p>The proposed xylene storage systems and pumping areas were designed to include secondary containment around all tanks so that any xylene that leaked would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's WWTP (see Section 2.8.5 of the Draft EIS). New construction in the proposed project area would be paved with impervious cement or compacted to near-impervious conditions. Potential impacts related to drainage from impervious surfaces are described in Section 5.3.2 and Table 5-5 of the Draft EIS.</p> <p>Leak detection systems for tanks and piping would alert workers in the event of a spill and there are spill measures in place to clean up any spills. Refinery personnel are trained in spill prevention and response. If the secondary containment failed, the spilled material would be routed to the WWTP. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery's WWTP, according to the requirements of the refinery's NPDES permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Additional information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch03-008	Rebecca Durr, Greg Durr	<p>We are concerned about locating dangerous chemicals such as Xylene in storage tanks along the shore of the Salish Sea, as well as installing a natural gas pipeline in this sensitive area between land and sea. We have the potential for disaster caused by earthquake, tidal wave, and human error.</p>	<p>Thank you for your comment.</p>
Ch03-009	Washington State Department of Ecology, Meg Bommarito, Yvonne Kicken	<p>2. Since the tanks proposed for the New Tanks Area would be regulated under WAC 173- 180, the secondary containment structures at this area are also subject to WAC 173-180- 320, including the seismic design requirements at WAC 173-180-320(9). Please identify and include these requirements in the final EIS.</p>	<p>Secondary containment berms around proposed tanks are described in Section 3.3.2 of the Draft EIS; it is noted that secondary containment structures in this area would need to comply with seismic design requirements per the International Building Code referenced in SCC 15.04. Reference to secondary containment requirements for aboveground storage tanks in WAC 173-180-320 has been added to this Final EIS in the errata in Appendix B. Additional information regarding secondary containment structures is provided in Table 2 in Section 3.1 of this Final EIS.</p>

ID	Contact	Comment Text	Response
Ch03-010	Washington State Department of Ecology, Meg Bommarito, Yvonne Kicken	<p>4. The American Society of Civil Engineers (ASCE) will publish the 2016 edition of ASCE Minimum Design Loads and Associated Criteria for Buildings and Other Structures (commonly known as ASCE 7-16) in July 2017. This update includes an entirely new chapter with tsunami design provisions, which is important to west coast states, Alaska, and Hawaii. It is presently anticipated that the new ASCE standard will be incorporated into the 2018 International Building Code, and then might be adopted by states in 2020 (ASCE, 2 016; http://www.asce.org/uploadedFiles/News Articles/ AS CE-Press-EventPresentations.pdf).</p> <p>Section 3.4.2.2 of the draft EIS indicates that all proposed components of the project would be located at higher elevations than the worst-case inundation scenario provided by NOAA for a tsunami in the study area. We would recommend all proposed components of the Tesoro Anacortes Clean Products Upgrade Project be re-evaluated against the updated tsunami design provisions of ASCE 7-16, as applicable. If any shore side infrastructure or operations are subject to the newer ASCE 7-16 standards, these requirements should be included in the final EIS as mitigation measures required for construction of the affected structures.</p>	As the proposed project components are outside of the worst-case inundation zone, the revised ASCE 7-16 standards would not apply to the proposed project.
Ch03-011	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter,	<p>Geologic impacts of the Xylenes Project</p> <p>The New ARU will be constructed on a remediated hazardous waste site. [DEIS 313] “Onsite cut materials would be inspected and tested to verify suitability before being used. If evidence of contamination is discovered, potentially contaminated soils would be segregated from clean materials and stockpiled for subsequent analysis.” [DEIS 317] What chemicals may be encountered? And what are the risks any lingering soil contamination might have on worker health, the environment and/or wildlife in the event of exposure via air, water or soil? How frequently will soil be tested for signs of contamination? What types of tests will be used? What types of safety procedures and protocols would be followed handling potentially contaminated soils? What types of safety procedures and protocols would be followed handling tested and confirmed</p>	There is no known contaminated soil within the proposed project area. The ARU site was previously remediated and provided with a letter of clean closure from Ecology in 2006 as described in Section 3.3.2.1 of the Draft EIS. If contaminated materials are discovered, Ecology would be notified and the contaminated materials would be managed in accordance with applicable regulations to dispose of these materials and to ensure worker safety during these activities.

ID	Contact	Comment Text	Response
	Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	contaminated soils? How will Ecology be informed and apprised throughout the process? The FEIS must more thoroughly address all of these questions.	
Ch03-012	Evergreen Islands	<ul style="list-style-type: none"> • What are the hazards associated with onsite geology, soils, erosion, earthquakes, liquefaction, including the shoreline area? • What are the geologic conditions along rail or marine transportation routes? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Ch03-013	Maureen Scheetz	All the Communities; human, wildlife, air and vegetation surrounding March's Point will be impacted by this industrial product. ... The soils, geologic resources and drainage patterns will be altered with a possible risk to people and other communities.	Thank you for your comment.
Ch03-014	Joline Betterndorf	The draft EIS for proposed changes in the Tesoro-Anacortes Refinery is incomplete. Among problems avoided or give short shrift are:... 3) the dismissal of possible natural disasters,	Thank you for your comment.
Ch03-015	Joline Betterndorf	3. Serious government agencies warn us that we are due for a major earthquake, more serious than any the region has experienced in living memory. I do not find any mention of the effect of any such major disaster, or even of major weather events, being addressed in any information from any agency. The Geologic Resources Fact Sheets mentions tsumnamis and earthquakes, two most possible events, but does not address their effects on the refinery. It seems obvious that there is no mitigation for either of these possible major events.	There is potential for geologic hazards associated with natural events, such as earthquake, tsunami, landslide, or volcanic eruption, to cause damage to proposed project infrastructure. The Draft EIS discusses geologic hazards, including earthquakes and tsunamis, and their potential impacts on construction and operation of the proposed project and on environmental resources in Section 3.4. Additional information regarding the agencies responsible for regulating seismic structural requirements is provided in Table 2 in Section 3.1 of this Final EIS.
Ch03-016	Colin O Hermans	The Tesoro facility is not safe in view of the imminent dangers of earthquake, tsunamis, and rapidly rising sea level. Accidents do happen. Is that a fact, not an opinion.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch03-017	David Worley	Considers the seismic risk of constructing this terminal in an area that could experience a high-magnitude earthquake and tsunami.	There is potential for geologic hazards associated with natural events, such as earthquake, tsunami, landslide, or volcanic eruption, to cause damage to proposed project infrastructure. The Draft EIS discusses geologic hazards, including earthquakes and tsunamis, and their potential impacts on construction and operation of the proposed project and on environmental resources in Section 3.4. Additional information regarding the agencies responsible for regulating seismic structural requirements is provided in Table 2 in Section 3.1 of this Final EIS.

Chapter 4: Air Quality and Climate Change

ID	Contact	Comment Text	Response
Ch04-001	Ryan Holewinski	This really means nothing though, if it is at the detriment of our environment, and that is why I truly feel this project is important. I am an avid outdoors person, and I love this area and feel that this project will help reduce the impact we make here. The vapor recovery system alone will help this refinery reduce the emissions we produce, which is an obvious benefit. With the addition of the ARU project, we will be removing xylene from our normal gasoline pool, and instead of being burned in vehicles, it will be used to manufacture products.	Thank you for your comment.
Ch04-002	Richard Tueslerl	I believe the project will ...reduce the amount of contaminants through the marine vapor recovery system.	Thank you for your comment.
Ch04-003	Sandra Kraus	<p>I look directly at the plant every day and am already concerned about the plumes I breathe every day that drift over my house as well as the risk we already face from oil trains, ship leaks and past aerial releases.</p> <p>As the EIS states: "The worst-case spill from either reformat, reformat backhaul (a byproduct material) from the ARU after xylenes have been removed, or mixed xylenes would release large quantities of VOC hazardous air pollutants (HAPs), specifically mixed xylene isomers, toluene, ethylbenzene, and isopropylbenzene. The ASIL concentrations for these VOCs would be exceeded for up to 24 hours, based on the results of the modeling, and would be a potentially significant impact.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Impacts on human health from air emissions and spills are discussed in Sections 9.3 and 9.6.2 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p>
Ch04-004	David Wilson	The Marine Vapor Emission Control Unit that will reduce wharf emissions by 95%. The NHT expansion that will allow the refinery to meet Federal Tier 3 gasoline standards that require reduced	Thank you for your comment.

ID	Contact	Comment Text	Response
		levels of sulfur in the gasoline production.	
Ch04-005	Colin Rockenbach	<p>The county's own Draft Environmental Impact Statement indicates fewer emissions with the CPUP project. Gasoline produced in China does not have to meet the same environmental standards.</p> <p>More jobs and cleaner air sound good to me!</p>	Thank you for your comment.
Ch04-006	Joseph Stivala	The project will help the company meet EPA TIER 3 sulfur specifications.... a good thing for the environment.	Thank you for your comment.
Ch04-007	Dori Bailey	This is have a huge impact on the air.	Thank you for your comment.
Ch04-008	Joseph Stivala	<p>This project will lower emissions from current day operation by 95%!! And takes out Co emissions from our gas pool and converts it into recyclable products! How can we not allow this? So if the project gets denied, we as a community are allowing this to further pollute our atmosphere.</p>	Thank you for your comment.
Ch04-009	Steve Berentson	Our country needs the products this refinery produces, and the proposed project will result in cleaner burning fuels.	Thank you for your comment.
Ch04-010	Matthew Williams	The new MVEC (Marine Vapor Emission Control) unit will have a significant positive impact to the local air quality and will enable the refinery to reduce volatile organic compound emissions at the wharf by a staggering 95%.	Thank you for your comment.
Ch04-011	David Corrion	This project reduces wharf emissions by 95% and reduces sulfur in the gasoline produced.	The analysis included in Chapter 4 of the Draft EIS accounts for the changes in refinery emissions as a result of the proposed project.
Ch04-012	Melissa Crezee	I also would like to point out the significant impact that the Marine Vapor Emission Control Unit will have at eliminating volatile emissions, above what is even currently happening. This, above and better, approach is something I regularly see Tesoro management support.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch04-013	Rebecca Canright	I am worried about the toxic emissions of xylene.	<p>In the event of a spill, xylene would be released to the air, followed by the evaporation of xylene. The impacts associated with a xylene spill and subsequent evaporation are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality – Section 4.4.4.2 • Terrestrial wildlife and marine birds – Section 6.4.3.3 • Human health – Section 9.6.2 • Xylene spills in the marine environment – Section 13.5
Ch04-014	Landis Lutton	Please look at the positive impacts this has to our environment and community ... Much better environmental emissions.	Thank you for your comment.
Ch04-015	Rebecca Spurling	<p>As a Tesoro process/environmental engineer that has lived and worked in Anacortes for over 25 years, I have been directly involved in multiple projects since 2001 that have reduced refinery air emissions by over 65% . The CPUP takes the next step in reducing air emissions even further by installing new and exciting technology at the refinery’s wharf!</p> <p>This new technology is called a marine vapor emission control system (MVEC), and is a major element of the Clean Products Upgrade Project. It is designed to capture and eliminate the air emissions that enter the atmosphere when products from the refinery are loaded onto marine vessels. Not only is the MVEC being installed to capture emissions associated with the new project, it also eliminates emissions from materials currently loaded by the refinery, like gasoline. This new equipment provides a measurable and significant benefit to the community by eliminating over 300 tons of emissions, specifically called volatile organic compounds (VOCs) by us environmental engineers. The MVEC reduces the air emissions at the wharf by 95% and is an investment that provides measurable and valuable benefits to the community. Eliminating emissions at the refinery’s wharf reduces the chance of any unpleasant odors reaching our neighboring communities. It’s that kind of continuous improvement that makes it exciting to work at Tesoro! And better yet, the MVEC design has advanced in recent years where the equipment selected by Tesoro</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>is the best technology available on the market today, offering the best emission control efficiency while operating with the highest energy efficiency rate. New projects bring the opportunity to invest in the newest and best technology, making it an exciting time to work as an engineer at Tesoro.</p> <p>While my comments above are centered on the MVEC (because I am personally excited about this particular investment), the project also brings additional measurable benefits by further reducing sulfur in gasoline, making the fuel we all use in our cars every day burn that much cleaner. Best available control technology is being invested throughout all elements of the project to provide an optimized, low-emitting, energy efficient design.</p>	
Ch04-016	Brett Powers	<p>As a lifelong Skagit County resident who has worked in the petrochemical industry for 38 years, and as a Tesoro employee who is personally involved in this project, I can appreciate the significant improvements that have been made over the decades to manufacture cleaner burning fuels that over time lessen environmental impacts. And also implementing new processes and technology within the refining industry that realize an immediate environmental benefit, such as a reduction in air emissions that would be the result of the installation of the Marine Vapor Emissions Control unit. This part of the project alone reduces volatile organic compound emissions at the refinery's wharf by 95%.</p>	Thank you for your comment.
Ch04-017	Richard Johnson	<p>Considering the chemistry and facility upgrades proposed the overall environment of our region will improve. Recovery and processing of volatile gasses will help the marine side of the refinery</p>	Thank you for your comment.
Ch04-018	Sarah Hammock	<p>It also reduces air emissions by installing new and exciting technology at our wharf.</p>	Thank you for your comment.
Ch04-019	Philo Wallis Lund	<p>Capturing vapor emissions sounds good. I am retired and suffer from COPd from a career around boats (acetone, bottom paint,</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		sawdust, diesel exhaust, etc) Air quality is extremely important to me. On some days downwind from you or on a day of an inversion the air I must breathe is a toxic fume and then there are the coal trucks and Pier II loading of coal and prilled sulfur cleaning my front porch requires a solvent!	
Ch04-020	Philo Wallis Lund	Here are some suggestions: ... 2) Why not discontinue refining when the weather conditions meaning laying a blanket of toxic fume over populated areas?	<p>Emissions and operating schedules from new, modified, or existing sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>The refinery’s Title V operating permit currently allows the refinery to operate 24 hours every day of the year. The operating permit is monitored and regulated by the NWCAA and contains pollutant limits, operating limits, and monitoring and recordkeeping requirements that define compliance with all air rules and regulations in federal, state, and locally applicable rules.</p> <p>The operating permit has requirements called “Duty to Comply” and “Need to Halt or Reduce Activity Not a Defense.” These compliance requirements explain the responsibility of the refinery to comply with their permit limits to prevent excessive emissions, including halting or reducing activities.</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-021	Dennis Parent	I don't want the added air pollution beyond what we already must live with.	Thank you for your comment.
Ch04-022	Jeff Schwab	<p>This project will benefit my community [by providing]... cleaner emissions for vehicles in the PNW</p> <p>Provide better protection for our marine environment by capturing emissions while unloading vessels</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch04-023	Phyllis Dolph	When crossing the Swinomish bridge onto Fidalgo Island, it is not unusual to have one's eyes sting along the with stench coming from the refinery. I do not for a minute think that is clean air. The EIS should take clean air into consideration. Dangerous airborne pollution from diesel engine exhaust is toxic, and causes numerous types of disease.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about odors or other air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p>
Ch04-024	Phyllis Dolph	This expansion will mean ... a rise in air pollution...	Thank you for your comment.
Ch04-025	Sheila Ryan	We already have enough toxic chemicals in our air without you adding more with the additional amount of traffic & pollution the new amount will add to the environment.	Thank you for your comment.
Ch04-026	Anne Elkins	<p>Some of my many concerns are:</p> <p>Marine transportation. How many more ships per day or week will there be? Because of the emissions from the ships themselves, if for no other reason, the number matters significantly, and we have a right to know. I didn't find this number mentioned anywhere. I</p>	<p>Marine vessel traffic would increase by approximately 60 vessels per year (approximately 5 per month). Approximately 40 of those vessels would be delivering reformat feedstock from other West Coast refineries. The remaining 20 vessels calling at Tesoro's refinery wharf structure would be for exporting mixed xylenes</p>

ID	Contact	Comment Text	Response
		<p>generally trust the safety of the ships only because of the Washington State Puget Sound Pilots program. I have seen Captain Mike's presentation twice, and I highly respect and trust their professionalism and dedication to protecting our waters. But the ships' emissions could become a significant contributor to degraded air quality.</p> <p>Air Quality. What proof do/will we have that there won't be an effect on our air. We get periods of intense chemical odors from the refineries on a regular basis, since we live in the path of the prevailing wind. What proof do/will we have that all these potential impacts are "less than significant"? I'm NOT willing to take [Tesoro's] word for it.</p>	<p>along the vessel transportation route to international markets. See Section 2.8.2 of the Draft EIS. Tankships, including tug-barge and articulated tug barge units, carrying reformat and mixed xylenes, would be required to have tug escorts and licensed pilots within the study area. See Sections 13.4.1.2 and 2.8.2 of the Draft EIS. Additional information regarding the agencies responsible for regulating the piloting of vessels, air emissions, and odors is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. The estimated vessel transportation and unloading criteria emissions are estimated in Section 4.4.3 in Table 4-12 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>The current odors coming from the refineries are not part of the proposed project. However, existing refinery emissions provided in Table 4-9 in the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about odors or other air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-</p>

ID	Contact	Comment Text	Response
			<p>services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-027	James Tangaro	<p>[The marine vapor recovery unit] will lower VOC emissions in the county by a significant amount. That coupled with the NWCAA press release about Skagit and Whatcom Counties having the cleanest air in the country in terms of ozone and fine particulates is very relevant! This project will make Skagit Counties air even cleaner.</p>	<p>Thank you for your comment.</p>
Ch04-028	Judy Hammer	<p>For the record: 83% of the total land area of Whatcom and Skagit Counties combined is National Forest, National Park, and National Recreation Areas (see Wikipedia). Not at all surprising that Bellingham is listed as #1 for "Cleanest U.S. Cities for Ozone Air Pollution" in the United States by The American Lung Association's Annual State of the Air 2016 Report Card. Skagit County was listed among 93 counties in the U.S. for cleanest ozone air pollution by this report, as well. However, please note: Anacortes, Mount Vernon, La Conner, and Burlington were NOT listed as cities with clean air. They were not listed as cities with dirty air. They were not listed, period. I would like to know where the air monitors were placed? As an Anacortes resident, I smell the refineries. I've called the Northwest Clean Air Agency (NWCAA). Apparently, if they cannot get to the area of the smell to take an air sample WHILE THE SMELL IS IN THE AIR, the pollutant release is not counted. About five years ago, I was told by NWCAA during one of my calls that they only had two employees who drive to the site of complaint of air odors. Skagit is a BIG county. There is no way that The American Lung Association's Report Card could be truly accurate given the above facts.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Existing refinery emissions provided in Table 4-9 in the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about odors or other air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-</p>

ID	Contact	Comment Text	Response
			<p>services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-029	Dan Cameron	From what I have read in your excellently prepared document the project includes a marine vapor emissions control system and expands the NHT unit to reduce sulfur levels in gasoline and meet EPA mandated Tier 3 gasoline environmental regulations.	Thank you for your comment.
Ch04-030	Roberta Hutton	Air pollution,...is very disturbing.	Thank you for your comment.
Ch04-031	Roberta Hutton	I live close by and am constantly afraid of the emissions now, and especially when the sirens go off-- and they do go off.	Thank you for your comment.
Ch04-032	Tom Decker	Enhancing the facility so it would supply cleaner, reduced sulphur transportation fuels and improve onsite air quality are net gains for the community and the environment.	Thank you for your comment.
Ch04-033	Ruth LeBrun	<p>1) YES- Do install a system that captures air emissions during marine vessel loading.</p> <p>2) YES - Do upgrade a production unit to help reduce the sulfur content in gasoline.</p>	Thank you for your comment.
Ch04-034	Mike Levine	I'm one of the vendors that supply products to the refinery as well as the contractors group refinery. So, in part, my family derives its living from the refinery. I'm here to remind everybody that this project is good for the community for a variety of reasons, one of which is the upgrades to the refinery, which allow it to comply with EPA regulations to ensure the gasoline is made safer and more compliant with removing the sulfur from the product as well.	Thank you for your comment.
Ch04-035	Mike Levine	It enhances the current VOC to allow for vapor recovery. This prevents some of the VOC contamination that people might be concerned about and will help to improve air quality.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch04-036	Libby Mills	I support Tesoro's efforts to improve clean air components of the refinery process. My home looks on that refinery from the east, and the air pollutants coming from those refineries and the ships that anchor are in every breath we as neighbors breathe. And I think that includes everyone in this room.	Thank you for your comment.
Ch04-037	Bob Hall	12. I tried unsuccessfully to find figures for how much Tesoro is currently allowed to pollute our air and water. The DE IS should state these figures for each pollutant, along with any change if this project was approved. It would be helpful for us who live in Anacortes and share this air and water to know a little about each of these pollutants that negatively impact our environemnt.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Tables 4-7 and 4-12 detail the proposed project’s emissions. The VOC emissions decrease from the refinery and the other criteria pollutants and GHG emissions increase.</p> <p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following</p>

ID	Contact	Comment Text	Response
			<p>sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-038	Dulcie Entermann	<p>I am very concerned about the potential of producing xylene in my home town.</p> <p>I moved here expecting very clean air, however we already have many times in the year that the toxins from Tesoro reach even WA park, across the other side of town!!</p>	Thank you for your comment.
Ch04-039	Charles Schultz	As part of the project, Tesoro is going to add gasoline de-sulfurization capacity, as well as an amine system used in the capture and transfer of the removed sulfur. The additional removal of sulfur from a combustion engine fuel will result in a reduction of sulfates emitted into the atmosphere as engine exhaust.	Thank you for your comment.
Ch04-040	Tom Hess	<p>The marine vapor emission control unit included in this project is really important for the reduction of emissions at the refineries wharf. It will reduce local emissions by 95%.</p> <p>Statewide emissions will also be reduced by allowing the expansion of the unit necessary to meet the new federal Tier 3 gasoline standards that require lower sulfur content in the gasoline produced at the refinery.</p>	Thank you for your comment.
Ch04-041	Bryce Oxford	This project, if approved, will include a Marine Vapor Emission Control Unit that will reduce wharf emissions by 95%. It will also	Thank you for your comment.

ID	Contact	Comment Text	Response
		allow the refinery to meet Federal Tier 3 gasoline standards that require reduced levels of sulfur in the gasoline produced at the refinery.	
Ch04-042	Chuck Hoover	It will reduce VOC emissions -- the atmosphere. And it also helps to secure the long-term viability of the refineries.	Thank you for your comment.
Ch04-043	Bruce H Gillett	Let's remember that a portion of this project is simply to meet the Clean Fuel Standards, as established by the EPA. And another portion of the project will practically eliminate the vapor emissions at the wharf.	Thank you for your comment.
Ch04-044	Carolyn Gastellum	There are two components stated in the official project description. One removes additional sulfur during the refining process and installs a special unit to transform hydrocarbons into higher octane gasoline components for blending. This would actually reduce air pollution.	Thank you for your comment.
Ch04-045	Bryan Potter	The release of volatile organic compounds is limited to a rudimentary discussion of xylene, but no mention of the myriad gaseous compounds resulting from its production is provided. The 99% efficiency of the planned MVEC and VOC combustion units begs the question of exactly how much of which compounds will persist as a result of its inefficiency. Xylene odor can be detected in concentrations as small as 0.05 ppm. Statements of current refinery compliance with EPA clean air standards are not pertinent to this specific matter.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about odors or other air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-services/enforcement/complaints/).</p>

ID	Contact	Comment Text	Response
			Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch04-046	Nancy Hansen	The smell of oil was heavy here[beach on east side of the refinery]. The amount of particulate matter in the air here is questionable. I would not want to spend much time breathing this.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Existing refinery emissions provided in Table 4-9 in the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about odors or other air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-047	Martha Hall	There are air pollution violations. All of these need to be in the EIS with an explanation of each. Unfortunately Tesoro denies each one for a long time. Sometimes it goes to court or appeals costing us more money. Tesoro has not been a good neighbor as far as living	An indicator of air quality compliance in a state or territory is the current compliance or attainment status of the region in comparison with applicable ambient air quality standards. The area around the refinery is in compliance, has never been a

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		<p>up to its commitments and admitting when it has problems. Instead, Tesoro withholds information and makes the task of regulating it more difficult. Trust does not exist between those of us who have to deal with the air and water pollution from Tesoro.</p> <p>Air pollution in Anacortes is a problem when the refineries have problems. From downtown, from our neighborhood schools, and even from my house which is some distance away, we periodically smell problems at the refinery. The odor is sickening and strong. Some of us try to report these but it's difficult to find the right person and the number is not well know.</p>	<p>nonattainment or maintenance area, and has always met both the federal and state air quality standards except for rare cases (e.g., local meteorological conditions such as an inversion) where an exceptional event may have caused a short period of exceptionally poor air quality. See Section 4.3 of the Draft EIS.</p> <p>Existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about odors or other air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-048	Carlo Voli	<p>How would this project affect the capability of the refinery reducing sulfur, the gasoline? That sounds like a great idea, good for everybody. Reducing -- control air emissions for marine vessels at the refinery, that's wonderful -- totally support it.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. The proposed project would indirectly reduce sulfur emissions from motor vehicles as the Tier 3 gasoline would burn cleaner. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of</p>

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			this Final EIS.
Ch04-049	Warren Tessler	Reducing emissions throughout is certainly a good thing. And the issue of the xylene production seems to have pros and cons here. I think the issue of taking it out of the tailpipe and locking it up into other products, by and large, seems to be okay. Although I hear some other things will -- and I may have to think about that some more. But, by and large, it seems to be -- on the whole seems to be a better thing -- taken out of the product and out of the tailpipe and out of the air and, you know, get it out of our lungs and that sort of thing. And, sure, it is a volatile product -- that sort of thing.	Thank you for your comment.
Ch04-050	Robert Gerfy	I am especially concerned about: ... 3. Current levels of refinery pollutants are too high; increased operations will increase these further.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Existing refinery emissions provided in Table 4-9 in the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p>
Ch04-051	Sue O'Donnell	Now we discover there was another hearing April 27 about permits for air quality. According to the Skagit Valley Herald today	The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in

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		<p>- 4/29/2017 – there will be new equipment designed to reduce some emissions but the refinery’s overall emissions would increase!!!!</p>	<p>Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Tables 4-7 and 4-12 detail the proposed project’s emissions. The VOC emissions would decrease from the refinery and the other criteria pollutants and GHG emissions would increase.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p>
Ch04-052	Beck Ivie	<p>Our air quality is already impacted by the refineries and chemical plant.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this</p>

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			Final EIS. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.
Ch04-053	Joanna Idczak	<p>Tesoro has a record of egregious and catastrophic safety and clean air violations.</p> <p>The Northwest Clean Air Agency is not inclusive in their oversight in my opinion. For an example that I have experienced, one cannot make a complaint about smelling air pollution from the refinery when one is conducting business or visiting in Anacortes, or driving by on Highway 20, depending on which direction the wind is blowing. The NWCAA can only accept complaints from a person who is living or employed at the specific site of the pollution odor. Compounding the inadequacy of this rule is that those who live or work where the pollution bathes them can lose their sense of smell. Olfactory loss can occur as a result of exposure to toxic air pollution.</p>	Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch04-054	Jean Avery	Tesoro's proposed project should comply with Clean Air Act requirements and safety requirements.	The proposed project is subject to and would be required to comply with CAA requirements as well as to state worker health and safety requirements. Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology, both of which are subject to the regulations of the CAA. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding agencies responsible for regulating the emissions from new or modified sources and worker health and safety at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch04-055	Mark Meeks	I urge that Clean Air Act requirements be respected and fulfilled.	The proposed project is subject to and would be required to comply with CAA requirements as well as to state worker health and safety requirements. Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology, both of which are subject to the regulations of the CAA. Worker

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			health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding agencies responsible for regulating the emissions from new or modified sources and worker health and safety at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch04-056	Pam Springer	I know there have been many who have voiced their concern about air quality, especially in Anacortes (and many have provided researched information to back up their concerns.)	Thank you for your comment.
Ch04-057	James M Strong	<p>(1) Xylene is a eight carbon compound based on benzene but is much less toxic than benzene.</p> <p>(2) Xylene occurs naturally in petroleum.</p> <p>(3) Combustion of xylene to carbon dioxide and water is relatively dirty combustion.</p> <p>(4) Some xylene and benzene compounds are required in gasoline to enhance the octane rating.</p> <p>(5) Removing some or all of the xylene should result in a cleaner burning fuel to move into the commercial fuels market.</p> <p>(6) Every barrel of oil which leaves an underground reservoir will, in time in our aerobic environment, become carbon dioxide and water.</p> <p>(7) The xylene portion of the petroleum based fuel , whether naturally occuring or produced in the refining process, which is diverted to polymer production will indeed slow down the ultimate converstion to carbon dioxide and water.</p>	Thank you for your comment.
Ch04-058	[Name not provided]	I believe that the impact on the community in the environment is significant. There is ...a rise in air pollution of the refinery	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the</p>

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			<p>region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Tables 4-7 and 4-12 detail the proposed project's emissions. The VOC emissions decrease from the refinery and the other criteria pollutants and GHG emissions increase.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p>
Ch04-059	Deborah Rudnick	I am extraordinary concerned... as well as the incremental risks to our state's ability to meet its emission standards.	Thank you for your comment.
Ch04-060	Marilyn Joy Atwood	I am highly concerned with air quality in this small community. We are already exposed to more than our fair share of pollution from the refineries. It's their job to deny any added pollution, and it's your job to keep them in check. Given the political climate at the moment with all regulations being dismissed, I can't trust any company that spills toxicity into our environment to not go for the money. Please deny the proposal.	Thank you for your comment.
Ch04-061	Sandy Robson	<p>Also, in terms of air quality, I would like to make you aware of something that is happening here in Birch Bay, WA., where I live, which is about a mile and a half from the BP oil refinery at Cherry Point. That refinery added a crude by rail terminal in 2012-2013.</p> <p>Besides the obvious issue of carbon pollution with petrochemical facilities, there is the issue of the wastewater treatment facilities which accompany those petrochemical facilities and their</p>	Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would also be required to use emission control

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		<p>operations.</p> <p>Since 2013, I have registered over 175 complaints with the Northwest Clean Air Agency (NWCAA), regarding a foul odor that wafts onto my property, and if my windows are open, it wafts into my home, causing me to have to close the windows. The odor has been traced to BP's wastewater treatment facility by both the NWCAA and by BP.</p> <p>NWCAA staff who have been sent out to my property and neighborhood, and to the BP refinery, to investigate the odor complaints have acknowledged the foul odor that they attribute to the BP wastewater treatment facility. For example, on March 12, 2015, I registered a complaint with NWCAA about the foul odor (likely from BP's wastewater treatment facility), and a staff person was sent out to the area to investigate it.</p> <p>I still have a saved voice mail on my cell phone from that same date, March 12, 2015, from the staff person (Scott Pratschner) with the NWCAA, who must have been the person who investigated the complaint. Scott said the following in his March 12, 2015, voice message I saved:</p> <p>"I definitely smell that odor that you're talking about. It's a smell I've come to associate with their [BP] land farm when they spread the bugs [not sure if that was the word I heard] out over this big field and the wind kind of blows across it if they are agitating it, and it can really, it's just a foul odor.</p> <p>"I am working with BP right now to see if we can find out what should be [inaudible couple words] that odor because they are not agitating the land farm right now which means it might be a maintenance activity along that line between the wastewater treatment plant and the land farm, something along those lines.</p> <p>"But, at least I know that odor, so when I go out there and inspect, it's one of the foulest odors that I encounter."</p> <p>Scott concluded with: "Keep calling us as you're impacted. Hopefully we can narrow down what the heck this maintenance activity is that's causing this and try to shield it somehow. Otherwise, I might be just taking enforcement action on them as</p>	<p>technologies designed to prevent air quality degradation and comply with health-based air quality standards.</p> <p>Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery's WWTP, according to the requirements of the refinery's NPDES permit provided in Appendix 2-B of the Draft EIS. Ecology would determine if the proposed project's impact on the existing WWTP would exceed design limits. All new waste streams must be evaluated to determine if the new loading plus existing waste streams would exceed 85 percent of the wastewater treatment system design capacity. An engineering report is required by Ecology 6 months prior to the start of construction.</p> <p>Additional information regarding agencies responsible for regulating the emissions and odors from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>well."</p> <p>Back on July 14, 2014, I registered a complaint with the NWCAA and they sent a staff person out to investigate. In the printout of the report, I read that the NWCAA staff person (Rebecca Brown) had reported (in part):</p> <p>"I then proceed[ed] to the west side of the house. At 11:22am detect the must/chemical odor 1 - 1.5 [on a scale of 0 - 4] for a few seconds then odor dissipated. At 11:25 -11:27am musty/chemical (smelled like burnt tires or smell when a match is being struck) odor came back at 1.5 - 3 on a scale of</p> <p>0 - 4. During that time my nose became irritated and I did not want to breathe in deeply. At 11:29am odor dissipated. At 11:35am I left the complaint's [sic] property. At 11:37am I called Scott Inoes [of BP] and informed him of my finding[s] at the complaint's [sic] residence. Inoes stated that all they detected on their odor patrol was flowers and pollen."</p> <p>Those are just two examples of the 175+ complaints I've registered with the NWCAA since 2013. To my knowledge, the NWCAA has never written-up a Notice of Violation on any of my complaints — no enforcement action has ever been taken. Because the BP refinery at Cherry Point was built at a time in history before environmental reviews were required and conducted for such projects, and because Whatcom County, in 2012, issued an MDNS for the BP crude by rail logistics facility which then did not require an EIS be conducted/prepared, the issue of the potential significant adverse impacts to, and from, the wastewater treatment facility and other operations related to the addition of the crude by rail facility were never studied and addressed.</p> <p>Besides having to be adversely impacted by the foul odor from BP's wastewater treatment facility time and time again, and having to shut my windows sometimes because of that odor (which prohibits me from enjoying my home even from the inside when it's warm and I want to open windows), I also wonder if the air I'm breathing is safe when I'm smelling that odor?</p> <p>I think it is important that in the Final EIS, you address this kind of</p>	

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		potential issue with the wastewater treatment facility which would be part of the operations and process if the project were to be permitted and operating.	
Ch04-062	Washington State Department of Ecology, Meg Bommarito, Yvonne Kicken	<p>Air Quality Program- Gail Sandlin, PhD (360) 407-6860</p> <p>Although Tesoro has discussed CAR obligations within the DEIS, the data will require our own analysis, which may lead to alternative compliance decisions. It is also anticipated that, separate from Tesoro's CAR obligations overall, statewide fuel GHG emissions may remain the same since other importers or producers may address local market demand.</p>	Thank you for your comment. Additional information regarding agencies responsible for GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.
Ch04-063	Swinomish Indian Tribal Community	<p>A. The Area of Influence Excludes Much of the Reservation, Which Currently Suffers Significant Air Quality Impacts from the Refineries.</p> <p>The Air Quality analysis depends largely on the data and modeling within the boundary of the "Area of Influence" (see fig. 4-1 in the DEIS). This approach does not provide an accurate picture of air quality impacts reasonably likely to occur from the Xylene project, because the Area of Influence (AI) is too small; it excludes much of the Swinomish Reservation that is influenced by air emissions from the Tesoro and Shell facilities. This can be shown by the data from our two Air Quality monitoring stations on the Reservation (one at the north end about 1.8 miles from the Tesoro facility, and one in the Tribal Village). It is well documented that emissions from the refineries area can impact air quality and health much further southeast of the AI boundary on the Swinomish Reservation, as evidenced by the emission incident at the Shell Refinery February 2015, which sickened a number of people as far away as the Tribal Village and LaConner.</p> <p>The AI boundary is set four miles to the north/northwest of the central Tesoro facility, then west about four miles, then southwest about four miles, but then only 1.8 miles southeast. It is unclear why this is the case, when that distance is less than half of the other distances from the center set by the AI. Using this shortening of the distance to the southeast, the boundary inexplicably excludes the Tribe's Casino / Hotel complex and the Tribe's Air</p>	<p>An expanded discussion of the meteorological data selected for modeling and tribal land impacts (including ozone-related impacts, north-wind conditions, and toxic air pollutants) is included in Section 3.8.1.1 of this Final EIS.</p> <p>Sections 3.3.1 and 3.3.5 provide further discussion on SO₂ impacts on the local airshed. The potential to emit increase is 5%, based on current local SO₂ concentration data, which would not approach the AAQS. So, the proposed project would not preclude other projects within the airshed.</p> <p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>Quality Monitoring Station.</p> <p>The Tribe’s northernmost Air Quality Monitoring Station is only 1.8 miles from the Tesoro property. This station has been in existence for nearly 20 years and provides data quality assured by EPA for upload to the National Air Quality System Database (https://epa.gov/aqs). It is difficult to understand why the DEIS air quality analysis appears to rely only upon the PM data and modeling from the Bartholomew Road station while excluding actual ambient air quality data from the Tribe’s two air quality monitoring stations, including the station located only 1.8 miles from the Tesoro property.</p> <p>In several places the DEIS states that there would be no exceedances of AAQS “on Tribal lands” when: (a) the AI excluded most homes within the Reservation; (b) the analysis of exceedances did not use the more complete ambient air quality data from the Tribe; and (c) therefore the more in-depth analysis afforded to areas within the AI was not truly conducted “on Tribal lands.” The DEIS statement therefore appears to be conclusory and unsupported by data. Similarly, the DEIS modeling scenarios for air quality impacts from potential spills associated with the project for some reason did not appear to include modeling of winds from the north, which would carry emissions toward the Swinomish Village. All models were analyzed with winds blowing from the southwest, south, and southeast. (See DEIS spill impacts section).</p> <p>B. Ambient Air Quality Standards (Criteria Pollutants) It is useful to look at a two of the criteria pollutants in relation to available data and modeling from the Swinomish Air Quality Program to further show that the DEIS is inadequate and incorrect.</p> <p>Ozone, a criteria pollutant, is not addressed in Section 4.4.2.1 Impacts on Air Quality from operations and maintenance. This pollutant is primarily formed when nitrogen oxide and volatile organic compound emissions combine in sunlight and typically requires some time and distance from the source. Monitoring and air parcel trajectory analysis by the Swinomish Tribe has found that conditions with light winds from the northwest on sunny days can</p>	

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		<p>result in elevated levels of ozone. This is not adequately addressed in the DEIS, which only states that “criteria and toxic emissions increases would not cause an exceedance for any AAQS or ASIL within Washington or Tribal lands,” and later states, “the proposed project would not result in any exceedances in air pollutants above the existing air quality standards within the air shed which includes the Swinomish Reservation.” This determination was made without reference to available data on criteria pollutants from Tribal monitoring stations, and may not be entirely accurate.</p> <p>Under the section on Cumulative Impacts to Air Quality the DEIS states that “the area of influence...[We again note specifically drawn to exclude the Tribal monitoring data] has always met both federal and state standards, except for rare cases (e.g. local meteorological conditions such as an inversion).” We have documented cases in which ozone exceeded or came very close to exceeding current ozone standards. For example, in 2012 we documented levels that would exceed the now-current ozone standard, and have documented a number of instances in which ozone levels were very close to exceeding this standard, within a few points. This data contradicts or calls into question the above-quoted DEIS statements. There is no “buffer” below the NAAQS for ozone providing room for the Xylene project to emit even more ozone, as the DEIS contemplates. The analysis should include available data for ozone. This data is available on the National Air Quality System Database and could have been easily provided had anyone contacted the Tribe’s air quality program.</p> <p>The DEIS notes that SO₂, also a criteria pollutant, is at 97% of the NAAQS and therefore may exceed standards if any new sources of SO₂ are added. The report states that modeling shows that the area most likely to approach exceedance for SO₂ is southwest of the refinery. It is not clear if this analysis excluded areas to the southeast of the refinery. It appears not to have included data available from the Tribe. This analysis is also inadequate regarding impacts of SO₂ on the Swinomish Reservation. One of the impacts of the project appears to be that, by taking up all the remaining increment, the project may preclude other development and activity within the airshed that produces even a small amount of</p>	

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		<p>SO2.</p> <p>Toxic Air Pollutants (TAPs) are of particular concern to Tribal populations. There are multiple potential pathways to those populations from the Tesoro refinery, via direct impacts of air quality and air deposition to waters, fish and shellfish. Due to higher fish and shellfish consumption rates by Tribal members, they may be exposed to additional and disproportionate health risks. Similar to the analysis of criteria pollutants noted above, the DEIS states that within the area of influence (again excluding much of the Reservation) no air quality exceedances are expected of the ASILs of TAPs, including for “tribal lands.” It is not clear if this statement applies to all Swinomish Tribal lands or just those within the AI. At the very least this requires clarification. There also appears to be no consideration of potential and cumulative impacts to health, including to Tribal members with higher consumption rates of fish and shellfish, from air deposition pathways of TAPs.</p> <p>C. Summary.</p> <p>The Air Quality section of the DEIS for the Tesoro upgrade project is inadequate and factually incorrect. The Area of Influence boundaries appear to have been drawn to exclude data from the Tribal air quality monitoring stations and exclude significant Reservation lands in the analysis of project impacts. The lack of analysis for human health on the Reservation is of great concern in light of the 2015 health emergency from emissions at March Point (Shell). The DEIS excluded available data that is part of the EPA National Air Quality Database, collected by the Swinomish air program from relatively near the facilities. Instead, the DEIS relied upon modeling alone for most parameters, but even then appears to have excluded north-wind conditions most likely to affect human health on a significant portion of the Swinomish Reservation. The DEIS was incorrect regarding the lack of exceedances of AAQS or ASILs including on tribal lands. Tribal air quality monitoring shows that past ozone levels, under north-wind conditions, have exceeded or come very close to exceeding current ozone. The DEIS analysis is also inadequate regarding potential pathways and health impacts of Toxic Air Pollutants, particularly to</p>	

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		<p>Tribal members.</p> <p>In short, the DEIS presents an incomplete assessment of air quality impacts to Swinomish tribal members due to the unexplained AI boundary, the lack of consultation with known EPA data, and failure to investigate pathways to existing susceptible populations.</p>	
Ch04-064	Friends of the San Juans, Stephanie Buffum	The air and water quality are essential to the environment and economy of the 8 million residents of the Salish Sea.	Thank you for your comment.
Ch04-065	Friends of the San Juans, Stephanie Buffum	<p>Also in recognition of shared geography, interrelated economies, and common goal to reduce ambient levels of air pollution, benefitting human health and the environment, the United States and Canada petitioned the International Maritime Organization (IMO) in 2009 to regulate air pollution from ocean going vessels with the highest possible standards.² (Anon. (2009). 'US Coastal Clean Up'. New Scientist. April 4. 4.) The North American Emission Control Area (ECA) was designated in 2010 by the IMO in specific portions of United States' and Canadian waters. For this area, the effective date of the first-phase fuel sulfur standard is 2012 and the second phase begins in 2015. Beginning in 2016, high standards for the emission of nitrogen oxides also become applicable. The results of these standards are expected to be that by 2020, emissions from these ships operating in the North American ECA are expected to be reduced annually by 320,000 tons for oxides of nitrogen, 90,000 tons for fine particulate matter, and 920,000 tons for oxides of sulphur, which is 23%, 74%, and 86%, respectively, below predicted levels in 2020 absent the ECA.³ (http://www.imo.org/mediacentre/pressbriefings/pages/28-eca.aspx. Also, Kotchenruther, R. (2013). 'A Regional Assessment of Marine Vessel PM2.5 Impacts in the U.S. Pacific Northwest'. Atmospheric Environment 68: 103-111. Tran, T. (2012). 'Potential Impacts of an Emission Control Area on Air Quality in Alaska Coastal Regions'. Atmospheric Environment 50: 192-202)</p> <p>[Figure 1: Area of the North American Emission Control Area 4 (http://www.epa.gov/otaq/regs/nonroad/marine/ci/420f10015.pdf)]</p>	<p>The vessel emissions increase from the proposed project is small in comparison to the reductions that are expected in the region due to the North American Emission Control Area fuel standard changes and engine changes.</p> <p>In sulfur dioxide emissions alone, the reduction in the North American Emission Control Area would be from fuels with allowable sulfur concentration of 15,000 ppm down to 1,000 ppm. Vessel shipment emissions are provided in Table 4-12 in Section 4.4.3 of the Draft EIS. Fuel standards to meet the recent requirements for low-sulfur marine fuels from the International Marine Organization are described in Section 3.3.5 of this Final EIS.</p>

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		With projected increases in vessel traffic, it is possible that the benefits of the ECA may be offset by the growth of vessel traffic in this region. Accordingly, we recommend that a study should be undertaken to see what impact of air pollution associated with increased vessel traffic, in the present and the reasonably foreseeable future, may have in this area and what impact these increases will have upon air quality standards.	
Ch04-066	Anacortes Chamber of Commerce, Stephanie Hamilton	The 95 percent reduction of Volatile Organic Compounds (VOCs) from the Tesoro marine wharf and the ability further reduce the sulfur content of the gasoline produced at the refinery will provide significant environmental benefits both locally and regionally.	Thank you for your comment.
Ch04-067	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	It is likely that emissions rates for SO ₂ should be categorized as significant.	The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Project SO ₂ emissions have been further analyzed in Section 3.3 of this Final EIS. Sulfur dioxide emissions during vessel unloading is discussed in Section 3.3.1 and ocean acidification due to SO ₂ emissions is discussed in Section 3.3.5 of this Final EIS.
Ch04-068	Protect Skagit, Washington Environmental Council,	Impacts to Air Quality Tesoro may Exceed Significant Emission Rates for Sulfur Dioxide	The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive

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	RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>Steep increases in sulfur dioxide (SO₂) and nitrogen oxide (NO_x) emissions from stationary sources combined with dockside vessel emissions could exceed regulatory thresholds, as a direct impact of the CPUP. Tesoro should be required to perform deposition analyses for SO₂ and NO_x on soils and receiving water bodies within 200 km of the Tesoro Facility.</p> <p>The DEIS shows that this project would result in a tripling of sulfur dioxide concentrations at Tesoro’s facilities. In Skagit County, approximately 70% of SO₂ emissions originate from March Point facilities. NWCAA Modeling (Draft EIS Table 49) shows background concentrations at 58 micrograms per cubic meter for the 1hour averaging period. The addition from the proposed project is modeled to increase to a Total Concentration of 190, a threefold increase. The Proposed Project Emissions Increase for SO₂ is 39.3 tons per year (tpy), just shy of the 40 tpy Significant Emission Rate (SER). Project Estimated Emissions for SO₂ may well be above the SER if onsite emissions from dockside vessels are included in the accounting.</p> <p>NWCAA Modeling (DEIS Table 49) shows SO₂ emissions near the limit at 97% of the National Ambient Air Quality Standards (NAAQS) for 1hour averaging period. A slight increase of only six micrograms per cubic meter in the Background Concentration of SO₂ from increased vessel traffic in the area from direct impacts of the CPUP would set the sulfur dioxide concentration over the AAQS. Moreover, Toxic Air Pollutant (TAP) Modeling (DEIS Table 410) results show that SO₂ would be at 86% of the acceptable source impact level (ASIL) for one hour averaging periods.</p>	<p>measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards.</p> <p>Estimated operating emissions for NO_x provided in Table 4-7 of the Draft EIS in addition with the estimated emissions from unloading provided in Table 4-11 are below the regulatory thresholds for PSD significant emission increases. The total NO_x emissions are below the significant emission rate thresholds and, therefore, modeling and additional analysis for NO_x were not completed.</p> <p>Project SO₂ emissions have been further analyzed in Section 3.3 of this Final EIS. The combination of the two sources of SO₂ emissions are over the significant emission rate threshold as discussed in Section 3.3.1 of this Final EIS. Sulfur dioxide emissions during vessel unloading is discussed in Section 3.3.1 and ocean acidification due to SO₂ emissions is discussed in Section 3.3.5 of this Final EIS.</p>
Ch04-069	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands	<p>Benzene Waste</p> <p>Resulting from Tesoro’s violations of the Clean Air Act, a 2016 settlement agreement with the U.S. Department of Justice required Tesoro to complete a third party audit of its benzene waste streams and correct any NESHAP Subpart FF noncompliance identified. Impacts of the CPUP should be accounted for in the audit, and the results should be included in the Final EIS.</p>	<p>The Benzene Waste Operations NESHAP audit that is required under the consent decree is for existing permitted sources and did not include future projects. However, the CPUP project is not expected to have waste streams applicable to Benzene Waste Operations NESHAP. The CPUP project would be permitted by NWCAA and would include monitoring, recordkeeping, and reporting provisions for VOC. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section</p>

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	Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge		3.1 of this Final EIS.
Ch04-070	Tesoro Anacortes Refinery, Rebecca Spurling	<p>Tesoro submits this letter, to assist Skagit County in clarifying the analysis of impacts from the CPUP, particularly in the following areas:</p> <ul style="list-style-type: none"> • The FEIS should acknowledge and more robustly describe the CPUP's positive impact on air quality emissions. 	Thank you for your comment.
Ch04-071	Tesoro Anacortes Refinery, Rebecca Spurling	<p>I. The FEIS Should More Fully Describe the Direct and Indirect Air Quality Benefits of CPUP.</p> <p>Tesoro agrees with Skagit County's conclusion that "no unavoidable significant adverse impacts were identified with respect to air quality."⁶⁸ The CPUP will result in air quality concentrations below regulatory limits within the state of Washington or triballands.⁶⁹ Overall, no unavoidable significant adverse impacts were identified with respect to air quality.⁷⁰ We suggest, however, that the FEIS more completely describe the positive impacts of the CPUP, including the various ways that the CPUP directly and indirectly benefits the air quality (both locally and throughout Washington).</p> <p>Skagit County has concluded that the the installation of the new high efficiency/low emission MVEC would reduce potential VOC and TAP emissions from the existing marine vessel loading system.⁷¹ To avoid any confusion regarding the analysis that Skagit County has conducted, the FE IS should emphasize this point in its</p>	The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. The use of ASILs is further discussed in Section 3.6 of this Final EIS.

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		<p>executive summary.</p> <p>Skagit County has also concluded that the proposed project will reduce emissions from motor vehicles compared to the No Action alternative. One of Tesoro's objectives for the proposed project is to improve the refinery's capability to deliver cleaner gasoline, as required by the EPA.⁷² The upgrades would lower the sulfur content in gasoline (resulting in cleaner fuel) and consequently reduce the sulfur emissions from automobiles combusting this gasoline.⁷³ Under the no action alternative, the refinery would be unable to meet the upcoming federal Tier 3 standards for reduced-sulfur gasoline in sufficient quantity to remain economically competitive.⁷⁴ Additionally, Tesoro suggests that the FEIS mention that the new gasoline sulfur standard will make emission-control systems more effective for both existing and new vehicles, and enable more stringent vehicle-emissions standards. The vehicle-emission standards, combined with the proposed reduction of gasoline sulfur content, will significantly reduce motor vehicle emissions of not only SO₂ but other combustion pollutants.</p> <p>The FEIS should also state that the proposed project is expected to have a beneficial impact on odors from the refinery operations as a result of installation of the MVEC. Odors from refinery operations may be associated with emissions of VOCs. Because the MVEC reduces emissions of VOCs from existing marine loading operations, as well as from new refinery marine loading activities of mixed xylenes product, the potential for odors will be reduced. Additionally, other VOC control technologies implemented include internal floating roofs on the new storage tanks and leak detection and repair programs for equipment in VOC service. These proposed controls represent Best Available Control Technology.</p> <p>Finally, the air quality impacts from a worst-case spill are overstated as "potentially significant" because the likelihood of a spill is negligible and ASILs are an inappropriate standard. Refer to Section D.3.d and H in this letter for additional detailed information.</p>	
Ch04-072	Anonymous	[Enforcement and Compliance History Online Detailed Facility	Thank you for your comment.

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		<p>Report]</p> <p>See page 5!</p> <p>CAA = Clean air act</p> <p>CWA = Clean water act</p> <p>RCRA = Resource Conservation and Recovery Act</p> <p>This is why we are legitimately justified in being highly concerned about xylene fugitive emissions!!! And after EPA fines, no less! Please, don't allow the Xylene Plant. Fine amounts are minimal compared to the profits Tesoro will make.</p>	
Ch04-073	Anonymous	<p>[Ozone Basics, copy of EPA web page]</p> <p>Not only is Xylene highly toxic, it creates bad ozone, too - our cloud cover holds in emissions within the troposphere!!!</p>	Thank you for your comment
Ch04-074	Evergreen Islands	<p>ESTABLISHMENT OF A MARINE PETROLEUM IMPORT/EXPORT TERMINAL</p> <p>The Joint Aquatic Resources Permit Application (JARPA) application² describes the Tesoro's marine shipping facility (see photo below) as follows (emphasis added):</p> <p>The Tesoro causeway and wharf facilitate marine vessel loading and offloading to and from the refinery.</p> <p>The JARPA application³ also states the that the plans for the proposed CPU Project are plans include the following (emphasis added):</p> <p>Install a new Marine Vapor Emission Control (MVEC) system that will reduce emissions of volatile organic compounds (VOCs). The MVEC System will control hydrocarbon emissions from marine vessels during loading operations.</p> <p>The JARPA application⁴ also states (emphasis added & abbreviations defined) Displaced vapors associated with refinery marine loading activities, including vapors from typical operations and the new project will be routed to a new MVEC System to control hydrocarbon emissions. The displaced marine loading</p>	Thank you for your comment

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		<p>vapors will be collected by vapor hoses routed to the DSU (Dock Safety Unit) consisting of two skid-mounted units positioned on the wharf structure. The DSU is an essential piece of the overall MVEC System that ensures the safety of the marine vessels and the overall MVEC System. The DSU requires the use of natural gas, which will be provided via a new 3-inch natural gas line routed along the wharf/causeway structure. The vapors exiting the DSU will be routed through an existing line available on the wharf/causeway structure, to the new VCU (Vapor Combustion Unit) located on-shore in the refinery, adjacent to the Wastewater Treatment Plant (WWTP). A natural gas line will also be routed to the VCU to provide support gas to optimize the combustion efficiency. The new natural gas lines to the DSU and VCU will be supplied by an existing natural gas line within the refinery.</p> <p>[Figure 2. Tesoro's Proposed MVEC System]</p>	
Ch04-075	Skagit Business Alliance, Christina Jennings	<p>In addition to the clear economic benefits this project would bring to the local area, it will also provide environmental improvements thru the installation of new equipment at the facility. The new Marine Vapor Emission Control Unit will reduce Volatile Organic Compound (VOC) emissions from the Tesoro Marine Wharf by 95%. The expansion of the Naphtha Hydrotreater Unit enable Tesoro to reduce the sulfur content of the fuels they produce which will reduce harmful emissions when used in motor vehicles.</p>	Thank you for your comment.
Ch04-076	Liz Lovelett	<p>Another concern I have heard is regarding emission control. Our community enjoys reasonably good air quality and we, as leaders, must protect and maintain this crucial element of our quality of life. I applaud Tesoro's investment in Vessel Emission Capture technology. Emissions from both the production facility and the idling tankers must be considered and mitigated.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Proposed project emissions have been further analyzed in Section 3.3 of this Final EIS.</p>
Ch04-077	AJ Kuntze	<p>I SUPPORT Tesoro's efforts to improve clean air components of the refinery process. Air pollutants from the Tesoro refinery (in</p>	Thank you for your comment.

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		<p>addition to the tanker ships that come and go) are in the air I breathe. More must be done to ensure clean air for all who live in the area must be priority.</p>	
Ch04-078	Linda Talman	<p>If I can already smell what you produce over in La Conner, it can't be good.</p>	<p>Thank you for your comment.</p>
Ch04-079	Jeanne Kleyn	<p>In producing a final environmental impact statement please also include local statistics about current levels of pollution, traffic, etc. Tesoro produces relative to the amount pollution, etc. will be increased and how many jobs are likely to be lost if the projects are refused. (Saying that the proposed projects will increase varying kinds of pollution, etc. by less than 2.2% and declaring that as not significant doesn't tell us very much. Nor do national and statewide figures help, if that's all that we're given. Please give us some hard numbers to crunch so we can better understand the size and possible impacts of the proposed changes.)</p> <p>The draft EIS did a good job of convincing me that local pollution and traffic are substantial and increasing. Tesoro already contributes quite enough to these problems. Why add to them, especially when a corporation will be the main beneficiary?</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p> <p>Current vehicular traffic along routes that would be used by the proposed project, and traffic associated with the proposed project, is discussed in Section 9.4.1 of the Draft EIS.</p> <p>If the proposed project is not constructed, current employment conditions would remain the same.</p>
Ch04-080	Barbara Tuttle	<p>As suggested, the project will increase emissions of particulate</p>	<p>Thank you for your comment.</p>

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		matter, volatile organic compounds and greenhouse gases.	
Ch04-081	Louella Bergeson	The Anacortes Tesoro Refinery staff, from top to bottom, has put much thought and training into this project called the clean products upgrade project This will reduce sulfur into it's refined products, such as gasoline, and will also decrease emissions during the transfer of petroleumbased products onto vessels at the refinery dock. Exacting the chemical compound x-ylene will be a safe process, storing it, and then shipping it overseas to be manufactured into useful materials such as Polyester and plastic. It's also a safe and great way of reducing the sulfur and putting it to good use!	Thank you for your comment.
Ch04-082	Kate Szurek	I live down Skagit Bay, south of the March Point refinery. I smell their emissions.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>The current odors coming from the refineries are not part of the proposed project. However, existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions and odors from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. NWCAA is responsible for enforcing requirements related to odor emissions from the proposed project, and, if there are odor violations, to issue fines and ensure prevention measures are taken. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about odors or other air quality problems can be submitted to</p>

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			<p>the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-083	Rene Vance	<p>In addition to supporting xylene production, I support the NHT expansion that will reduce sulfur in gasoline. Our government has mandated lower sulfur levels in gasoline, and Tesoro's NHT expansion is trying to comply with those mandates. I also support the installation of a Marine Vapor Emission Control (MVEC) unit that will improve air quality for workers and the community by eliminating VOCs from loading operations at Tesoro's wharf.</p>	<p>Thank you for your comment.</p>
Ch04-084	Jeff Swayze	<p>Upgrading the refinery's equipment to provide cleaner burning fuels and lowering the refinery's emissions at our marine wharf will provide long-term environmental benefits to the surrounding area.</p>	<p>Thank you for your comment.</p>
Ch04-085	Barbara Kelly	<p>If it doesn't comply with the Clean Air Act, it is NOT a good plan!</p>	<p>The proposed project is subject to and would be required to comply with CAA requirements as well as to state worker health and safety requirements. Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology, both of which are subject to the regulations of the CAA. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding agencies responsible for regulating the emissions from new or modified sources and worker health and safety at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-086	Arno Jansen	<p>Upgrading the refinery's equipment to provide cleaner burning fuels and lowering the refinery's emissions at our marine wharf will provide long-term environmental benefits to the surrounding area, together with improving the refinery's long term viability.</p>	<p>Thank you for your comment.</p>

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Ch04-087	Arno Jansen	However it would be good for the EIS to clearly state the benefit of the MVEC, so that the decision-makers are more fully aware that the Clean Products Upgrade Project has been designed to include investments that bring value to our community.	Thank you for your comment.
Ch04-088	Chris Wolfe	We don't need more pollution, and this plan would add the carbon equivalent of 80,000 cars.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-089	Teresa Dix	I have lived in Mount Vernon for eleven years and in the northwest for forty years. This place is my home and I love it dearly, so the proposed project at Tesoro has me concerned and these are my comments about the proposal. I am most concerned about the increase in emissions of particulate matter, volatile organic compounds and CO2. Any mitigation of this project I hope will be based on the Clean Air Rule, and the carbon pollution should be offset by clean energy projects.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p>

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Ch04-090	Debra McGee	<p>Due to the lowest ice coverage in recorded history at the poles, scientists report we are now in "uncharted territory regarding the climate".</p> <p>Scientists have proven that global climate disruption is caused by the human behavior of extracting and burning of fossil fuels. Scientists have documented, and my personal experience as a farmer and landowner confirms, that we have already experienced one degree of temperature increase.</p> <p>While I understand you are only interested in the "letter" of the law by meeting all requirements to allow and permit this project, in the interests of all humanity, let alone other species, as well as you own families and future unborn relations, please deny this project and stop the destruction of our only home, this planet.</p> <p>You know what is right. Participating in our own destruction by heating the planet is suicidal and truly absurd.</p>	Thank you for your comment.
Ch04-091	Wim Houppermans	I do like cleaner fuel this next year. So let's hope for -- but, again, 10 years from now I hope that we're all driving electric.	Thank you for your comment.
Ch04-092	Cheryl Harrison	The draft EIS identifies an increase in air and climate pollution from ongoing operations. This pollution should be accurately calculated to ensure that Washington state can meet its goals to act on climate change.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Complaints about air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for</p>

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			regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch04-093	Valerie Rose	<p>The EIS must include:</p> <p>...</p> <p>5) Predicted increases in air and climate pollution, caused by the manufacturing of xylene, must be fully offset by specific mitigation projects in the region.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-094	Navneal Mangat	I think in this day in age, we should not be expanding fuel plants' size and quantity. We should be investing more in renewable energy that gets us prepared for the future, not investing in dangerous and polluting fossil fuel plants.	Thank you for your comment.
Ch04-095	Sandy Childs	Tesoro's commitment to the local environment through this project will reduce greenhouse gas emissions and lower wharf emissions by 95%.	Thank you for your comment.
Ch04-096	Kathryn Alexandra	The proposal for containing the excess xylene produced while loading the product is unacceptable - gathering it in pipes, returning it to land , and burning it off, thus producing toxic substances which contribute to the CO2 in the air.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Tesoro evaluated different options to capture vapor emissions while loading vessels at the refinery wharf. The use of a VRU and a VCU was considered. Tesoro chose the VCU primarily because it has a higher level of VOC control (i.e., results in lower VOC emissions) compared to other control equipment. The</p>

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			<p>determination to use a VCU over a VRU is discussed in Section 2.9.1.3 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-097	Sigrid Asmus	<p>I ask the Skagit Clunty board to include in its environmental assessment strong provisions requiring that accurate calculations for for the full extent of carbon pollution be made These provisions must be mandatory, because the draft EIS identifies a huge increase in air and climate pollution from ongoing operations for this project, while yet claiming inadequate and unacceptably unverifiable carbon offsets as the _only_ mitigation. Once carbon enters the atmosphere, it can never be removed -- where is the offset for that?</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-098	Sara Holahan	<p>ES7.2 Air Quality and Greenhouse Gas The EIS states that air quality will receive increased VOCs yet it supposedly will meet NAAQS/WAAQS standards. There is no mention of the many violations and fines Tesoro has been assessed due to the release of toxic substances. They recently were fined \$325,000 for an accidental release in late 2016. In 2013, they paid \$1.1 million for another violation. I don’t think that your consultants did a very thorough research. There is already of history of air quality problems, why would the county allow Tesoro to expand?</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. The prior violations and fines for accidental releases are discussed in Appendix 2-A of the Draft EIS. However, in part to address the concern regarding the history of air quality problems, existing refinery emissions provided in Table 4-9 in the Draft EIS are included in the ambient background concentrations</p>

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		<p>They dismiss the greenhouse gas impacts from 60 additional tankers because it is below the 25,00 metric tons threshold. Shouldn't this actually be studied as Tesoro's total annual vessel traffic to see if it exceeds that limit? Also what enforcement mechanism exists to monitor how many ships are actually arriving and departing? How many are delivering reformat and how many are shipping xylene?</p> <p>The EIS dismisses GHG impacts, yet later in the study, they refer to a 17% increase in electricity and 68% increase in natural gas. When considering the Refinery's operations, this is a huge amount of increased greenhouse gas and must be included in the evaluation. What mitigation is proposed? Why not a solar energy generator? It's time for Tesoro to look to the future of clean energy as other oil companies are doing throughout the world.</p>	<p>for the region as used in the analysis of air quality impacts. Proposed project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Additional information regarding agencies responsible for the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project emissions and potential mitigation has been further analyzed in Section 3.3 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Ch04-099	Carl Ullman	<p>1. Greenhouse Gas (GHG) emissions and air pollution. The DEIS identifies increases in air and climate pollution from ongoing operations of the proposed project, which is to its credit. But it also includes unverifiable carbon offsets as mitigation. These calculations should be evaluated and refined.</p> <p>Mitigation should fully offset increases in pollution with mitigation projects specifically located in Northwest Washington. Mitigation should be done in a way that not only offsets the carbon pollution but that also created jobs, economic development, and infrastructure in the local community. The proposed project and its mitigation should be used, unironically, as a tool for moving us away from our dependence on fossil fuels, not in some future, but now, with this project.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Ch04-100	Ruth Holder, Phillip Holder	<p>C. Greenhouse Gas Emissions and Climate Change</p> <p>The DEIS identifies a significant 389,496 metric tons per year of CO2e per year (352,659 metric tons of CO2e emissions as well as</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with</p>

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		<p>435 metric tons from fugitive emissions, 28,087 from electricity use and 8315 metric tons from transportation). Table 4-11. Tesoro has proposed an unverifiable reduction in emissions related to mixed xylenes production based on the notion that a portion of the fuel produced at the refinery (5,200 barrels of fuel production per day) would be converted into petrochemical feedstock thus removing that fuel from the U.S. market. The fuels reduction would serve as credit (306,000 metric tons per year) to offset Tesoro's GHG emissions.</p> <p>There is no guarantee given by Tesoro or described in the DEIS that Tesoro would permanently remove fuel from the U.S. market over the life of the mixed xylenes project. Tesoro would respond to market demands and not only existing but future buyers and contracts. The refinery would be capable of meeting both new or increased market demands for fuel products and for mixed xylenes. There is no limit on the amount of Bakken crude that Tesoro can receive at its recently permitted oil by rail receiving facility. Among other things, the permits for this project, mistakenly issued on a "mitigated determination of nonsignificance" finding, set no limit on amounts of Bakken crude that Tesoro could receive. (Soon after receiving the permits, Tesoro increased the number of oil trains received. Hays, K. UPDATE 2-Tesoro lifts volumes of Bakken rail project. Reuters. August 2, 2012. Available at: http://in.reuters.com/article/2012/08/02/tesoro-bakken-idINL2E8J276M20120802. Accessed May, 2017. Tesoro could increase this number again.) Additionally, the Kinder Morgan Transmountain Pipeline Expansion Project will increase the delivery of tar sands "oil" to Tesoro via pipeline from 170,000 barrels per day to 225,000 barrels per day -- a 32 percent increase. These feedstocks could be used to keep fuel production at the current or perhaps even increased level despite the production of mixed xylenes without further SEPA review or permits. The FEIS must fully analyze Applicant's representations about this GHG emissions offset and Tesoro's capability of resuming its present (or increased) level of fuel production in order to ensure that Tesoro's stated reduction of fuel going to U.S. markets is realistic and would remain constant over the life of the mixed xylenes project. If</p>	<p>transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. The proposed project's emissions, comparison to air quality standards, and proposed emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p> <p>Information regarding technology alternatives, such as cogeneration and combined heat and power, is discussed in Section 3.2 of this Final EIS.</p>

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		<p>conditions based on representations made today could change at any time over the life of the project based on fuel markets (including whether Tesoro or even another oil company might make up the amount of fuel Tesoro no longer supplies to the market), the FEIS must disclose to decision makers and the public the potential loss of this GHG offset scheme and identify a credible and permanent method of GHG emissions offset.</p> <p>Moreover, the DEIS states that Skagit County knows that the proposed emissions offset approach does not follow established standards for determining credits to offset GHGs and may be unacceptable to the Department of Ecology. §4.4.6. The DEIS finding that the project’s contribution to climate change based on this unlikely methodology is “less than significant” is unfounded. The FEIS’s conclusions about GHG emissions must not be based on this tentative offset methodology but must recommend mitigation to reduce GHG emissions over the life of the project based on acceptable standards.</p> <p>GHG mitigation must be achieved in a way that not only offsets the carbon pollution, but also creates jobs, economic development and infrastructure in our Skagit community. Tesoro must be required to offset 100% of their increases in on-site GHG emissions with local clean energy projects that also would create jobs, economic development and infrastructure in local communities. Also, following the lead of other area refineries in reducing GHG impacts, Tesoro should be required to install cogeneration boilers for its steam plant to provide steam and electricity to the facility. In 2012, the Northwest Clean Air Agency required a GHG mitigation program be established for increased greenhouse gas emissions resulting from the BP refinery’s ultra-low sulfur diesel project. BP paid approximately \$4.5 million dollars in mitigation funds. The Northwest Clean Air Agency used these funds to pay for mitigation programs including a program in the four-county region to make cost-efficient energy projects available to homeowners and small businesses. The FEIS must consider mitigation that builds on this kind of program.</p> <p>The common law Public Trust Doctrine discussed above has also been applied in recent court cases involving failures of</p>	

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		<p>governments to effectively control greenhouse gas emissions and climate change. Among the natural resources a government holds in trust for future generations is the atmosphere. We agree with the comment submitted by Carolyn Gastellum describing these recent cases and their relevance to this matter. The FEIS must take these decisions into account in considering the significant adverse direct, indirect, and cumulative climate change impacts as a result of the GHG emissions.</p>	
Ch04-101	Tesoro Anacortes Refinery, Rebecca Spurling	<p>Tesoro submits this letter, to assist Skagit County in clarifying the analysis of impacts from the CPUP, particularly in the following areas:</p> <ul style="list-style-type: none"> • The FEIS should clarify that there will be no emissions of Greenhouse Gas (GHGs) from any type of spill. 	Potential GHG emissions as the result of a spill have been further analyzed in Section 3.3.3 of this Final EIS.
Ch04-102	Evergreen Islands	<p>AIR QUALITY</p> <ul style="list-style-type: none"> • What are the project’s effects on global climate change? • What are the Marine Vapor Emission Control (MVEC) Emissions due to Displaced Marine Vessel Vapors? • What are the Marine Vapor Emission Control (MVEC) Emissions due to Assist Gas? • What are the Marine Vapor Emission Control (MVEC) Total Emissions? • What are the Xylene Oil Storage Tank Emission Rates? • What are the Xylene Storage Tank’s Toxic Air Pollutant (TAP) Emissions? • What are the Clean Product Update Project’s Daily Emissions and Annual Emissions? • What are the cumulative impacts from other past, present, and reasonably foreseeable projects on the project site or in the project vicinity? • What are the impacts from air emissions, dust, and odors from facility operations; including possible health effects from release of 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.

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		<p>air toxics? Includes general comments regarding air quality and air pollution?</p> <ul style="list-style-type: none"> • What are the impacts from exhaust emissions from diesel-electric locomotives? • What are the impacts from exhaust emissions from marine vessels operating on the Salish Sea or moored at the loading dock 	
Ch04-103	Laurie Sherman	<p>Tesoro’s plan will mean carbon pollution equal to adding another 80,000 cars to the road, which cancels out the original intent of the Tier 3 standards.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-104	David Perk	<p>The final Environmental Impact Statement should correct the following omissions from the draft version:</p> <p>...</p> <p>Accurate calculations for carbon pollution: The draft EIS identifies a huge increase in air and climate pollution from ongoing operations for this project, while claiming unverifiable carbon offsets as mitigation. This pollution must be accurately calculated and mitigated to ensure Washington state can adequately meet its goals to act on climate change. (Draft EIS summary, page ES 19.)</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>

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Ch04-105	Joline Betterndorf	The draft EIS for proposed changes in the Tesoro-Anacortes Refinery is incomplete. Among problems avoided or give short shrift are:... 4) omitting responsibility for additional environmental pollution and for climate change.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-106	Joline Betterndorf	4. Finally, it is important to me personally that this country show concern and take responsibility for the planet's environmental health and for our contribution to climate change. How are we not responsible if we send polluting agents to other countries so we can claim our morality? This seems shameful, hypocritical, self-serving and saddens and embarrasses me that we present this image to the world.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-107	Kate Lunceford	The EIS proposes huge increases in air pollution with unverifiable mitigations. The real cost of damage to the environment needs to be included in all permitting.	Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch04-108	Carolyn Lilly	This carbon pollution would equal to adding another 80,000 cars to the road. We must save our planet for our children and	The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive

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		grandchildren.	<p>measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is on in Section 3.3 of this Final EIS. Proposed mitigation measures are on in Chapter 4 of this Final EIS.</p>
Ch04-109	Glen Anderson	WE MUST COMPLY with Clean Air Act requirements and reduce sulfur content of their fuels.	Thank you for your comment.
Ch04-110	Thomas Pollock	I strongly oppose this project and as well as the building of any other fossil fuel infrastructure. Global warming is the largest threat facing the world today and any investment into fossil fuel moves us in the wrong direction. We should be tearing these facilities down, not expanding their capabilities.	Thank you for your comment.
Ch04-111	Veronica Bush	While I see the impacts of climate change listed in the proposal, this does not offset the change. Saying climate change will happen regardless of this is both false, and besides the point.	Thank you for your comment.
Ch04-112	Polly Freeman	Our environment cannot tolerate any increase in greenhouse gases.	Thank you for your comment.
Ch04-113	Gayle Janzen	You must also consider potential increases in greenhouse gases that must be properly accounted for and fully mitigated.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at</p>

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			<p>the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-114	Liz Spoerri	<p>Furthermore, the expansion of this project fuels climate disruption and threatens our waterways.</p>	<p>Thank you for your comment.</p>
Ch04-115	Robert Bojorquez	<p>The neighboring Tesoro refinery is proposing to build a \$400 million xylene plant that would increase...greenhouse gases.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-116	Maradel Gale	<p>And finally, this product, xylene, is manufactured from Bakken crude oil, which means more fossil fuels brought into the atmosphere, adding to our carbon pollution load.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in</p>

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			Chapter 4 of this Final EIS.
Ch04-117	Kerry	I am absolutely against this we do not need to do more fossil fuels.	Thank you for your comment.
Ch04-118	Brett Powers	Other components of the project include certain equipment upgrades that will significantly reduce greenhouse gas emissions.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-119	Kerry	It [the project] would increase ... greenhouse gases.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-120	Barbara O'Steen	We have a planet-wide crisis of unforgivable proportion. Mankind has so changed the climate that now we are going to destroy	Thank you for your comment.

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		<p>mankind.</p> <p>Do you really want to contribute to that future?</p>	
Ch04-121	Dennis Parent	<p>Having said that, let's be realistic about the future and our necessity to transition to non fossil fuels, as much as possible The clock is ticking toward midnight with regard to climate change, according to climate scientists. We must listen to them for the sake of our grandchildren.</p> <p>Let us not encourage further growth of heavy fossil fuel operations at our local refineries.</p>	Thank you for your comment.
Ch04-122	John Janson	<p>I do not buy into the argument that the huge amount of green house gasses that will result from full implementation will be offset by simply exporting the chemicals to the Far Eastern markets. that's just sweeping the dust under the global carpet for the moment.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-123	Phyllis Dolph	<p>Greenhouse gasses (GHG) which trap heat in our atmosphere speed up climate change. Operation and maintenance of project trains, tankers, and other equipment would result in emissions of pollutants and GHG into the atmosphere. Any increase at all is inexcusable. Our grandchildren will not respect us if their world is so ruined by climate change.</p>	Thank you for your comment.
Ch04-124	Phyllis Dolph	<p>It is important, as we face increasing climate change, that we assist Tesoro in beginning to shut down, not expand. It is important that we do not "feed" Asia products which will increase climate change.</p>	Thank you for your comment.

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Ch04-125	Lise Grace	We should be seeking to create jobs that do not promote increased greenhouse gas production and further acceleration of climate change.	Thank you for your comment.
Ch04-126	Karin de Wielle	At this point, to invest in projects that utilize fossil fuels and produce greenhouse gases is a backwards and ignorant course. The evidence on climate change is clear, and allowing this to go ahead is the height of irresponsibility and negligence.	Thank you for your comment.
Ch04-127	Melinda Mueller	1. The information re carbon emissions resulting from this project lacks detail, both in the quantifiable carbon expected to be released, and the specifics of "mitigation." What particular projects, to mitigate carbon in NW W	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-128	William McPherson	Greenhouse gases from the refinery should be monitored and mitigated, with no net increase.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in</p>

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			Chapter 4 of this Final EIS.
Ch04-129	Rocky Votolato	This project is a bad idea. Do not go forward with it for the sake of our climate and the future health of our children!	Thank you for your comment.
Ch04-130	Stacy Oaks	Scientists have globally agreed that our actions-- both personal and large scale-- in the next ten years are critical in determining if we will leave the next generation a planet that will be able to sustain them. We must avoid any new fossil fuel infrastructure. New jobs can be created by investing in clean energy.	Thank you for your comment.
Ch04-131	Wendy Courtemanche	I also ask that...there is a specific calculation of any pollution increase related to this project and how this increase will be specifically mitigated to ensure that WA meets its climate change goals.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-132	Steve Garey	Tesoro contends that the project would result in a net decrease of greenhouse gas emissions. An evaluation of this issue, I think, by experienced agencies should be required in the Final EIS to confirm this. It is of course another benefit, if this is found to be the case. However, even if it is determined that a small net increase in emissions is realized, that could easily be mitigated in the ways of supporting of more local jobs. Carbon offset credit should be purchased, if necessary, locally so as to support energy efficiency and new clean power infrastructure locally.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG</p>

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			emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.
Ch04-133	Colin Stewart	But what about the externalized cost unaccounted for? With the carbon tax that was proposed in last state's legislature, where past -- Shell Corporation would have had to pay \$48 million for 2 million metric tons of carbon dioxide it emits annually; Tesoro had to pay \$31 million for the 1.2 million carbon dioxide it emits annually.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-134	Carl Ullman	We're, I think, mostly -- if not all -- in agreement that climate change and global warming is something we're having a terrible time dealing with across the board. And one of the reasons that we're having that difficulty is what I think of as sort of a death by a thousand cuts. We look at each individual project. We say, "Well, that one doesn't have that much of an impact. That one -- oh, and this one over here. That one doesn't have as much of an impact either." Each individual project is assessed -- each individual project is determined not to have any or not to have enough of an impact to worry about, and here we are. We have a thousand projects and a thousand cuts and a situation with global warming that has slipped out of our control. The DEIS on this project needs to take a closer look at what the real cumulative impacts are. If they're minimal, they still need to be quantified. And they need to be quantified in the context of other similar projects that are coming along; and perhaps, more importantly, they need to be quantified in the context of all the previous cuts -- all the previous projects that we've got going on around us right now. Otherwise, this will just be another cut in the thousands of cuts that are	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>

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		preventing us from dealing adequately with climate change and global warming.	
Ch04-135	Juliet Miller	Expanding operations in fossil fuels at this time exacerbates climate change.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-136	Sally Chang	We need to be moving away from the use of fossil fuels in order to avert catastrophic climate change. Therefore, adding new infrastructure such as that which Tesoro is proposing is counter productive. Please do not let this happen.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-137	Evelyn Adams	I have lived in Anacortes for over 36 years and am well aware of the benefits the refineries have provided my community. However, I am also well aware of the trade-offs, such as the pollution of the commons, in this case the atmosphere. Any	The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section

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		<p>potential project that will increase carbon emissions needs to be rigorously scrutinized and bear the weight of proof that its service to the community trumps its contribution to the climate crisis.</p> <p>The proposed xylene plant project would add an estimated 390,000 metric tons of greenhouse gases annually to a commons that is already so overloaded that we are now at 410ppm of atmospheric carbon (as opposed to pre-industrial levels of 280ppm). If emissions continue on their current trajectory, by mid-century the atmosphere could reach a state unseen in 50 million years (as noted April 4 in the respected science journal Nature Communications). The EIS must require full, verifiable offsetting of increases in refinery pollution.</p>	<p>4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-138	Bob Hall	<p>6. Any increase in carbon pollution needs to be clearly stated along with the clear statement on how this will be mitigated in Washington State. Mitigation must be local and verifiable. This was not adequately done in the EIS.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-139	Carol Thibeau	<p>The net greenhouse gas emissions will NOT be reduced but rather INCREASED because production will be increased.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at</p>

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			the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.
Ch04-140	Richard Alspach	We are running out of time to stop climate change caused by the burning of fossil fuels. I am in opposition to this project because the state of Washington should be a leader in clean energy. Increasing our capacity to refine oil does not put us on a path to a sustainable climate for our children and grandchildren.	Thank you for your comment.
Ch04-141	Jennifer Beetem	The draft EIS includes estimates of the significant carbon pollution that will be generated by this project, but lacks specifics on how it will offset this pollution. Without substantial mitigation investment, the carbon pollution generated by this project pose an unacceptable risk to statewide efforts to meet carbon reduction goals. Washington state industry strives and innovates to meet carbon targets, and Tesoro must be held to the highest standard for mitigation if it proposes to emit such high levels of pollution.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-142	Jill Rand	In addition, it is becoming increasingly clear that we are running out of time to address the reduction of carbon and greenhouse gas emission and air pollution in our atmosphere. According to NASA we have 4 years left to keep a global temperature rise below 1.5C, as we continue to see increasing ocean levels (which will also impact the safety and operation of this proposed marine terminal), and more severe storms (which may also impact the safety and operation of the refinery and the oil rail terminal in the form of more mudslides, more falling trees and more flooding). Expanding operations in fossil fuels at this time, exacerbates climate change	Thank you for your comment.

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		in the near future.	
Ch04-143	Sally Stapp-Brigham	<p>I'm so lucky to live in Anacortes, Washington state -- our tremendous natural beauty here in the Pacific Northwest is undeniable. But climate change is threatening that beauty, and the health of millions of people across the country.</p> <p>[Email from Senator Parry Murray on Earth Day 2017]</p>	Thank you for your comment.
Ch04-144	Gordon Zurn	<p>We are sensitive to concerns that will be voiced by some in regards to greenhouse gases, but again feel that any real increase in risk that can be determined can also be mitigated through this process. We recognize that Tesoro believes that the project will result in a net decrease in GHG emissions. Independent study by experienced and capable agencies should be done to confirm this -- a reduction and cleaner air clearly benefits. However, even if it is eventually determined that a small increase in GHG emissions will result, that increase can only be mitigated -- it can -- it can and should be done in a way that increases more jobs.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. The increase in jobs as a result of the proposed project is discussed in Section 11.5 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-145	Andy Mayer	<p>Besides the strong lasting impact on our economy, I understand that this project will also have a net reduction of carbon emissions.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in</p>

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			Chapter 4 of this Final EIS.
Ch04-146	Alice Lockhart	<p>I'm here to ask that this EIS be admitted to truly account for carbon impacts and, ultimately, that the xylene poison pill part of the permit be denied. I know some of you in this room and in society feel that carbon impacts are less important than local jobs. You may feel that global warming is unproven. This is a myth. The reason virtually all scientists agree that we're in dire danger of climate collapse is simple physics -- how gasses behave when warmed by the sun and the fact that once carbon is in the atmosphere, it stays there for a very, very long time. Many may feel that it's a problem that we have plenty of time to fix it. Also, the only thing that science has ever gotten wrong about climate change is to overestimate the time we have left to act and to underestimate how fast it is accelerating as we near the tipping point. We now know for sure that if we don't act decisively in the next three to ten years, we will see climate chaos; and there will be no jobs for our children and grandchildren. Many believe that it's okay to build this plant because Tesoro promises to somehow offset the carbon pollution from the xylene. This is not actually possible. And we in fact have to do the equivalent of the offsets, in terms of planting trees, to even come out maybe kind of okay. Even without building this plant, we expect to see Highway 20 underwater starting sometime around 2050.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-147	Jeff Aslan	<p>I'm with Sustainable Connections. We're a nonprofit that runs a few of the energy efficiency program to help homeowners and small businesses in Skagit, Whatcom, and Island Counties. And we also do energy audits on commercial and industrial facilities. I see some issues with the methodology used for analyzing greenhouse gas emissions in the draft EIS. This is a plant expansion. None of the existing production capacity of the plant is going to be reduced. A new boiler and other equipment at the plant is going to add 350,000 metric tons of carbon dioxide per year, and another 40,000 metric tons is going to be added from offsite emissions. This is past the threshold for being deemed a significant impact. The Draft EIS claims that this project is going to have a net reduction in greenhouse gas emissions somehow and avoid</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in</p>

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		<p>mitigation because the xylene is going to be exported to other countries, rather than being used as a petroleum product that is combusted in Washington. This goes against past precedents used for analyzing greenhouse gas impacts. Climate change is a global problem and shipping the product overseas does not reduce the Tesoro plant's greenhouse gas emissions. This plant's onsite emissions increase is a serious impact and should be subject to mitigation. In 2013, we were awarded funding from the Northwest Clean Air Agency to mitigate greenhouse gas emissions from another refinery's expansion project by making homes and businesses in our area more energy-efficient. This type of mitigation will not only reduce greenhouse gas emissions but also make our buildings more comfortable, reduce utility bills, and create living wage jobs, and boost our local economy.</p>	<p>Chapter 4 of this Final EIS.</p>
Ch04-148	Carolyn Gastellum	<p>I'm a mother and a grandmother who's deeply concerned about the future for our adult children and our grandchildren and yours because of the unprecedented rise in climate pollution from the burning of fossil fuels.</p>	<p>Thank you for your comment.</p>
Ch04-149	Carolyn Gastellum	<p>The other component is for the production of the xylene, which would create the significant cumulative adverse impacts of adding 380,000 metric tons per year of greenhouse gases. The Department of Ecology considers 25,000 metric tons to be significant; meaning more than moderately harmful to the atmosphere, water, air, soil, human and nonhuman life.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-150	Carolyn Gastellum	<p>Our planet is slowly suffocating under a heavy blanket of greenhouse gases that is wrapped around the planet, holding in</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in</p>

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		<p>heat and throwing CO2 and oxygen out of balance. It's like losing the ability to breathe normally until it's too late. Please study the significantly adverse impacts of the additional 380,000 metric tons per year accurately identified in the DEIS. Carbon remains in the atmosphere for a long time. That means new carbon dioxide emissions have a significantly adverse cumulative effect, adding to emissions that were already there.</p>	<p>Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-151	Rocky Votolato	<p>The Tesoro refinery is proposing to build a \$400 million xylene plant that would increase ...greenhouse gases.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-152	Robert Bojorquez	<p>The neighboring Tesoro refinery is proposing to build a \$400 million xylene plant that would increase ...greenhouse gases. Xylene is a flammable petrochemical used to make plastic and synthetic materials that would be shipped to China.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at</p>

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			<p>the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-153	Barbara O'Steen	<p>Your proposal to build a \$400 million xylene plant at Anacortes would increase ...greenhouse gases.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-154	Martha Hall	<p>8. Increased carbon pollution is not adequately covered in the EIS. The amount of current and future carbon pollution if the xylene plan is approved should be stated and analyzed to explain exactly how this will be offset. Is it verifiable? If so, how? This is necessary as we all know because of climate change. We more than most people should understand what will happen to the water in the Skagit River when our glaciers have completely melted.</p> <p>It is important that the mitigation occurs in Washington State and not somewhere else.</p> <p>We are the ones who will have to deal with the increase carbon. How will Tesoro offset this in Washington State?</p> <p>Mitigation cannot use the higher standard for gasoline products which is already required. Mitigation will need to be new mitigation.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>

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Ch04-155	Alex Ramel	<p>I've got a background in doing greenhouse gas accounting. I work with cities, including New York and Phoenix, doing greenhouse gas [unintelligible]. The DEIS identifies anticipated emissions increasing about 380,000 metric tons of carbon dioxide. It's the equivalent of 80,000 cars and about 15 times the threshold of which Ecology SEPA guidelines would consider it significant. The DEIS suggests a unique approach to greenhouse gas emissions offsets, which amounts to a credit for the carbon content of xylene being shipped out of state. It's simply implausible that shipping petrochemical products to Asia should be considered a legitimate part of the solution of climate change. In addition to failing the smell test, this approach does not follow established guidelines for determining credits for greenhouse gas emissions. You know, we all [unintelligible] production standards agree that any mitigation offset has to be real, verifiable, additional and permanent. This mitigation meets only their fallible standard. Seems unlikely that other refineries -- It seems likely that other refineries will make up for Tesoro's reduced fuel reduction. If Washington's fuel consumption doesn't change, this is simply accounting trade that boosts the emissions of Tesoro's wallets. If there is a real reduction change, it's because of corporate fuel economy standards, vehicle electrification, mass transit, and individual driver choices -- all of which would be the case with or without this project. The emissions reduction isn't additional. There is no barrier to Tesoro increasing production of commodity fuels in the future. It will continue to use their steam plant and other sources of climate pollution. The credit isn't permanent or enforceable. So, I am asking that the Final EIS clarify how any offset used as mitigation for this project demonstrate to commonly accepted standards that the reduction is real, verifiable, additional, and permanent.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-156	Patricia Resseguie	<p>The long term ramifications to global warming must be considered.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are</p>

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			<p>subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-157	Bonnie Miller	I worry the project will add to greenhouse-gas emissions that contribute to climate change	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-158	Will Golding	How will this project impact drivers of climate change like greenhouse gas emissions?	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in</p>

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			Chapter 4 of this Final EIS.
Ch04-159	Will Golding	What impacts does this project have on goals set at the Conference of the Parties to the United Nations Framework Convention on Climate Change agreement in Paris 2015?	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p> <p>Washington State has declared its commitment to the Climate Change agreement and will continue to move toward 1990 GHG levels (seehttp://governor.wa.gov/news-media/united-states-climate-alliance-adds-10-new-members-coalition-committed-upholding-parisfor additional details).</p>
Ch04-160	Sharon Levine	If allowed, greenhouse gasses will increase and negatively affect our climate.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>

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Ch04-161	Bob Zeigler	<p>The document states that because of natural gas or treated fuel gas as a fuel and good combustion technology would minimize Green House Gas and sulfur dioxide emissions. What is the increase in amount of natural gas used as fuel and the line out the dock? What is the source and amount of that natural gas to be consumed and what venting of it would occur? At March Point near the refinery people have experienced headaches already from vented gases at the facility, Natural Gas in its production and transport and venting that occurs can release significant amounts of greenhouse gases so while less carbon dioxide than coal or oil, it is not a neutral impact product on climate change.</p>	<p>The proposed project’s natural gas usage, emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>The Draft EIS discusses the increase in use of natural gas as a result of the proposed project in Section 2.8.4.1 and the potential impacts of this use on the local natural gas supply in Section 8.4.2. Natural gas venting was accounted for in the fugitive emissions from the proposed project components. See Section 4.4 of the Draft EIS for a discussion of fugitive emissions. The Draft EIS does not account for venting associated with the natural gas brought to the refinery through transmission lines owned and operated by Cascade Natural Gas. These transmission lines have venting stations that are used when there is maintenance on the transmission line or if the transmission line is over pressured for any reason. Natural gas transmission lines in the Pacific Northwest typically do not over pressure due to a lack of high ambient temperatures required for this process to occur. Therefore, natural gas transmission line venting is considered an insignificant contributor to GHG emissions.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-162	Robyn Hallonquist	<p>I would like the EIS to address the environmental impacts of...the emission of greenhouse gasses which contribute to global warming,</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p>

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			<p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-163	Millie Magner	<p>Their plan would mean carbon pollution equal to adding another 80,000 cars to the road.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-164	Mark Meeks	<p>I urge that impact on the climate with greenhouse gas emissions be fully evaluated and considered with a view to protecting us from greater movement towards climate change.</p>	<p>Thank you for your comment.</p>
Ch04-165	Bruce Rustad	<p>As a member of our community, the Salish Sea and surrounding environment has always been an important part of my life. That is why I am happy to see Tesoro's commitment to the local environment through their investment in a project that will reduce greenhouse gas emissions by over 300,000 metric tons per year and lower wharf emissions by 95 percent.</p>	<p>Thank you for your comment.</p>
Ch04-166	Chelsea Blank	<p>A few things that I think need more attention are... the</p>	<p>The proposed project's emissions, comparison to air quality</p>

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		<p>management; the offset of the additional emission of greenhouse gases, such as the highly significant excess of 380,000 metric tons of emissions. Additionally, that sending these products to Asia doesn't count as proper mitigation.</p>	<p>standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-167	Kenneth Bosworth	<p>Fossil fuels usage is not going to go away in our lifetime..and this comment is not about the industries involved being good neighbors and supporting the communities where they are located. The refineries have known for over 30-40 years that they are adding to the change in our climate and yet they have continued to slowly make some changes environmentally. Our plea is responsible refining has to occur for our planet to even exist.</p>	<p>Thank you for your comment.</p>
Ch04-168	Henry Reed	<p>Regarding the environmental effect of the CPUP on global climate change, we suggest that a stylistic change be made on page 4-29. This page contains a “bulleted” list of expected negative environmental impacts caused by global warming. Many of these statements are written in a conditional tense, as indicated by using the word “would”. Our suggestion is to change the word “would” to be the word “will” in the following bullets: the second through the eighth, and the eleventh. For example, the second now reads, “Sea level would rise in the Puget Sound by 4 to 56 inches by 2100.” This statement should read, “Sea level will rise in the Puget Sound. . . .”</p> <p>The reason for this change is that global climate change is now beyond question, as the entire EIS has been written as accepting it. The Tesoro CPUP has not been approved yet, because the EIS is still in question, so statements about the CPUP are framed as</p>	<p>The Draft EIS uses the term “would” because the projected changes are based on a set of assumptions. If any of the assumptions used for these calculations did not hold true, it would be inappropriate to suggest that these changes ‘will’ occur.</p>

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		<p>conditional (would) statements, but statements about climate change per se are now accepted as fact. Puget Sound has already risen by four inches, according to many sources!</p> <p>Thank you for accepting this improvement in writing style.</p>	
Ch04-169	Phyllis Dolph	<ul style="list-style-type: none"> • [image of woman wearing a mask] Accurate calculations for carbon pollution: The draft EIS identifies a huge increase in air and climate pollution from ongoing operations for this project, while claiming unverifiable carbon offsets as mitigation. This pollution must be accurately calculated and mitigated to ensure Washington state can adequately meet its goals to act on climate change. Climate change is the biggest threat to the well being of our planet of our age. Please note the number of people in the climate marches in Washington, DC , and in sister cities like Bellingham and all over the world. You cannot mitigate climate pollution. Let's face it. This cannot be done. Carbon pollution will hugely increase, so eventually the project should be denied. 	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-170	Joel Carlson	<p>Fossil fuels must stay in the ground to save us from the sixth great mass extinction of life on earth due to fossil fuel global warming. We must have sustainable agriculture that stores carbon on our soil as well. This is urgent! See https://en.wikipedia.org/wiki/Permian%E2%80%93Triassic_extinction_event and http://www.ecowatch.com/climate-change-pacific-northwest-2389078581.html</p>	<p>Thank you for your comment.</p>
Ch04-171	Susan Ferrel	<p>The effects of the plant on climate change have not been adequately addressed.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at</p>

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			the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.
Ch04-172	John Mcclung	Keep the PacNW moving towards clean energy, not fossil fuel and other pollutants!!!	Thank you for your comment.
Ch04-173	Jim Ciecko	None of it is getting us any closer to slowing global warming much less reversing it .	Thank you for your comment.
Ch04-174	Galen Herz	I am concerned that the draft EIS for this project is missing some key elements, including accurate calculation of carbon pollution and specific mitigation strategies for offsetting carbon pollution.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-175	Jim lombard	<p>Second: The EIS does not address fully the greenhouse gas emissions associated.</p> <p>Solution: A full account of all greenhouse gas emissions should include reformat and propulsion fuels, in addition to the transport and handling of all materials used during the processing of Xylene.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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			Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.
Ch04-176	Helen Moran	<p>What's missing from the draft EIS:</p> <p>Accurate calculations for carbon pollution: The draft EIS identifies a huge increase in air and climate pollution from ongoing operations for this project, while claiming unverifiable carbon offsets as mitigation. This pollution must be accurately calculated and mitigated to ensure Washington state can adequately meet its goals to act on climate change.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-177	Becky Kilpatrick	<p>This proposal would also impact Climate Change by adding more carbon pollution to the air. At a time when we should be aggressively pursuing clean energy to save this already threatened earth this is definitely the wrong way to go.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-178	Steve Wilhoit	<p>Issues like climate change as simply irrelevant as there is no data nor scientific evidence to support the global impact of a single</p>	<p>Thank you for your comment.</p>

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		small factory.	
Ch04-179	Deborah Rudnick	<p>In particular, the EIS needs to include:</p> <p>-Accurate calculations for carbon pollution: The draft EIS identifies a huge increase in air and climate pollution from ongoing operations for this project, while claiming unverifiable carbon offsets as mitigation. This pollution must be accurately calculated and mitigated to ensure Washington state can adequately meet its goals to act on climate change.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-180	Mary Manous	This encourages the use of fossil fuels that need to be kept underground if we are to prevent catastrophic climate change in our life times.	Thank you for your comment.
Ch04-181	Rebecca Durr, Greg Durr	How will this proposal contribute to increased climate change?	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>

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Ch04-182	Elisabeth Robson	<p>The final EIS must include a full account of the greenhouse gas emissions of the project. At a time when we should be drastically reducing our GHG emissions, this project will only increase our emissions, and increase our fossil fuel infrastructure, and increase our reliance on substances which clearly have no future. We should instead be focussing on building infrastructure, training (and re-training), and jobs in renewable energy--one of the fastest growing sectors in the United States. The EIS should include the long term opportunity cost of investing in fossil fuels instead of investing in renewables.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-183	Kathleen Lorence-Flanagan	<p>6. Tesoro ranks as one of the top 100 toxic air polluters in the US. Since the atmosphere is already overloaded, the EIS must require verifiable offsets for 100% of the annual addition of 389,500 metric tons of greenhouse gas emissions.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-184	Carl Ullman	<p>2. Cumulative effects – GHG. The unverifiable reduction in emissions is based in part on the idea that xylene will be shipped out of state for use in Asian plastic manufacturing. This is not an effective use of clean air rules or of methods to assess cumulative impacts. Shipping plastic precursors offshore is not a real solution to climate change and this should not be counted as a reduction.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are</p>

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			<p>subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS, including a discussion about compliance with Washington’s Clean Air Rule. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Ch04-185	Skagit Audubon Society, Timothy Manns	<p>8. Calculation of net Green House Gas (GHG) emissions needs to be brought in line with state laws and regulations.</p> <p>We agree with the comment made by Alex Ramel of Stand.earth at the April 17th public meeting on the draft EIS concerning its failure to properly account for the increase in GHG emissions which this project would entail. If the project is to be permitted, the increase should be entirely offset by local clean energy projects and should not be excused from this requirement by the potential for the exported xylenes to be transformed into plastic items overseas rather than being burned as components of gasoline. The increasingly serious effects of global warming require nothing less, and we wish Tesoro and all such companies were doing much more. The claim on page 4-25 is a stretch: “The proposed project concurrently creates GHG emissions credit by reducing the fuel produced and marketed within the state of Washington.” Please off-set the GHG emissions of the proposed project with local clean energy projects at least equivalent to the local increase in emissions.</p> <p>The final EIS must correct its accounting of the project’s GHG emissions and commit to local clean energy projects as mitigation at 100% of emissions.</p>	<p>Additional analysis of GHG emissions and potential mitigation measures are further discussed in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p> <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-186	Diana Jordan-New	<p>I am happy to see Tesoro's commitment to the local environment through their investment in a project that will reduce greenhouse gas emissions by over 300,000 metric tons per year and lower wharf emissions by 95 percent! This is huge!</p>	<p>Thank you for your comment.</p>

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Ch04-187	Amy Mower	<p>The Final EIS must properly account for any increase in greenhouse gases from this project, and any increase must be fully mitigated by the proponent.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-188	Carolyn Gastellum	<p>Tesoro’s mitigation plan is based on an inaccurate application of the state’s clean air rule under SEPA.</p> <p>The DEIS accurately identifies significantly 380,000 metric tons per year of increased greenhouse gas emissions (GHG) from the xylene project.</p> <p>In the DEIS Tesoro claims that by “removing a portion of fuel production that is typical within the refinery and converting it into xylene production (a chemical feedstock) that would be exported to global markets....a portion of Tesoro’s fuel produced at the refinery would be removed from the U.S. fuels market.” (DEIS 4.4, Potential Impacts on Air Quality and GHG)</p> <p>Instead of accepting this statement as a show of decreasing greenhouse gas emissions, the Final Environmental Impact Statement (FEIS) must assess the greenhouse gas increases from the burning of marine diesel if the proposed 60 additional tankers per year are allowed to travel through the sensitive marine habitats in the Salish Sea and the cumulative significant direct and indirect adverse impacts of these emissions over the life of the project on our global climate.</p> <p>Shipping xylene for the production of various plastic gadgets and</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS, including a discussion about compliance with Washington’s Clean Air Rule. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>

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		<p>clothing in Asia will add to the significant adverse impacts on global warming and climate change. The</p> <p>FEIS must do a thorough analysis of greenhouse gas emissions from all sources due to this proposed project and the significantly adverse direct, indirect, cumulative effects of those emissions over the life of the project in order to be in compliance with the following requirements of the Washington State Clean Air Rule under SEPA:</p> <p>SEPA requires the consideration of direct, indirect and cumulative impacts of a project. This is true even if the impacts themselves occur outside of local jurisdictional boundaries. (see WAC 197-11-060(4)) (Bold type added.) Greenhouse gas emissions directly, indirectly, and cumulatively lead to changes in our global climate.</p> <p>“Cumulative impact” is not defined in state rules, but it is defined under federal rules implementing NEPA, as an “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” This definition was cited with approval by the Washington Court of Appeals. See <i>Gebbers v. Okanogan PUD No. 1</i>, 144 Wn. App. 371 (2008). http://www.ecy.wa.gov/programs/sea/sepa/climatechange/QA.pdf</p> <p>Include in the FEIS a thorough analysis of the significantly adverse direct, indirect, cumulative impacts of the additional 380,000 metric tons/year accurately identified in the DEIS that would be a result of primarily on-site emissions.</p> <p>The DEIS fails to take into account the health, safety, and welfare of present and future generations “to protect the constitutional rights of young people from climate pollution.”i</p> <p>According to the Washington Department of Ecology studies from 2014, both Shell Puget Sound Refinery and the Tesoro Refinery on March Point near Anacortes are in the top ten worst climate polluters.</p>	

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		<p>[Attachment - Table of Washington's Top 10 Climate Polluters, 2014]</p> <p>[Attachement - below]</p> <p>SOURCE: Washington Department of Ecology</p> <p>Allowing the Tesoro Refinery, which is listed as 6/10 of the top climate polluters in our state as of 2014 to increase climate pollution by thousands of tons per year plus the GHG emissions from potential marine tanker shipping to Asia and the production of plastics in Asia fails to protect present and future generations from climate pollution.</p> <p>Pertinent lawsuits against states and the federal government are currently underway.</p> <p>“Our Childrens’ Trust elevates the voices of youth to secure the legal right to a stable climate and healthy atmosphere for the benefit of all present and future generations.</p> <p>https://www.ourchildrenstrust.org/mission-statement/</p> <p>On November 10, 2016 Judge Ann Aiken issued an opinion and order denying the U.S. government and the fossil fuel industry’s motions to dismiss a constitutional climate change lawsuit filed by 21 youth. The decision means that youth, age 9 - 20 and from all over the U.S., now have standing because their rights are at stake, and now their case is headed to trial.</p> <p>https://www.ourchildrenstrust.org/us/federal-lawsuit/</p> <p>This applicable to the DEIS and the FEIS because on December 19, 2016 Judge Hollis Hill ruled that the youths who sued the state Department of Ecology for failing to take action on climate change can move forward with a constitutional climate rights claim that adds the state of Washington and Gov. Jay Inslee as defendants.</p> <p>On May 1, 2017, U.S. Magistrate Judge Thomas Coffin issues: recommendation that governments and fossil fuel defendants for interlocutory appeal be denied; and denial of government’s motion, supported by fossil fuel defendants, to put trial on hold.</p> <p>https://www.ourchildrenstrust.org/court-orders-and-pleadings</p>	

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		<p>The lawsuit against the federal government is going forward claiming that the rights of 21 young Americans have been unconstitutionally violated because the federal government has allowed greenhouse gas pollution to be pumped into the atmosphere for 50 years, despite knowing the risks, “resulting in a dangerous destabilizing climate system.” http://www.salon.com/2016/11/13/climate-change-in-the-courtroom-milestone-lawsuit-awaits-donald-trump-administration_partner/</p> <p>Skagit County Planning and Development Services must take these lawsuit claims seriously and reflect on our role in Skagit County to either act to protect our children from the significantly adverse direct, indirect, and cumulative climate change impacts from the additional greenhouse gas emissions into the atmosphere from Tesoro’s new xylene project or to disregard these threats and allow the project to go forward. Again, I refer to the earlier sited SEPA requirements. The FEIS must rigorously assess the potential cumulative climate change impacts over the life of this project on our air, water, soil, marine environments, farmlands, fresh water sources, and on human health in nearby communities on Fidalgo Island and on neighboring communities in Skagit County for the foreseeable future.</p>	
Ch04-189	Sustainable Connections, Opportunity Council, Jeff Aslan, Ross Quigley	<p>In review of the DEIS we appreciated the acknowledgment of the reality of climate change and its impacts on our community. However, we found the DEIS lacking when it comes to its analysis of the greenhouse gas (GHG) emissions arising from the proposed project, the cumulative impact analysis of GHGs and the lack of mitigation to offset the increased emission from this project to be troublesome.</p> <p>Summary of the DEIS’s GHG Analysis</p> <p>The DEIS states that the proposed Xylene production project is a plant expansion and “operation of the proposed project would not change the crude oil processing capacity of the refinery, the capability of the refinery to receive crude oil, or the method and number of crude oil deliveries via marine vessel, pipeline, or rail.” (Pg. ES-12). A new boiler and other equipment on-site is going to</p>	<p>Additional analysis of GHG emissions and potential mitigation measures are further discussed in Section 3.3 of this Final EIS, including a discussion about compliance with Washington’s Clean Air Rule. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p> <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at</p>

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		<p>add 352,659 metric tons CO2 per year, and another 36,837 metric tons of CO2 emissions are going to be generated from off-site activities such as electric generation and increased transportation of Xylenes (Pg. 4-17), totaling a 389,496 metric ton increase. To put that in perspective, it is the equivalent of adding 82,275 cars on the road and is well beyond the scope of being deemed a significant impact under state and federal law.</p> <p>Yet the DEIS goes on to conclude that the proposed project will “take a portion of fuel produced at the refinery and convert it into petrochemical feedstock, thereby removing it from the U.S. fuels market.” (Pg. 4-22) And this “fuel reduction within the state of Washington could result in an estimated concurrent GHG emissions reduction of 695,000 metric tons per year. The net proposed project GHG emissions could be a reduction of 306,000 metric tons per year.” (Pg. 4-23). And because there is a net decrease resulting from the project, no mitigation is proposed beyond BACT to reduce emissions from the plant, which amounts to “good combustion practices and the addition of the new components to the refinery leak detection and repair program.” (pg. 4-25).</p> <p>GHG Cumulative Impacts Analysis is Not Supported</p> <p>We are skeptical of the DEIS’s claim that by shifting production to Xylene at the plant, this will somehow lead to less petroleum product combustion in Washington. Gasoline and diesel are global commodities. Washington has four other refineries, and the portion of the Tesoro Plant’s production that is going to be switched to Xylene production is less than 1% of the statewide total production. For there to be a reduction in transportation emissions in Washington, cars and trucks would need to gain efficiency or there would need to be less vehicle miles travelled. Because fuel is a fungible commodity, if the Tesoro plant switches some of its production away from fuels to Xylene, some other refinery could easily backfill the demand by using more of their fuel in state, not leading to any reduction of GHG emissions in Washington.</p> <p>Even if one were to extend their cumulative GHG analysis beyond</p>	<p>the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>the state of Washington, there is little support provided for the notion that global GHGs will decrease as a result of this project. The DEIS does not analyze the lifecycle emissions of xylene produced at the Tesoro plant. Xylene is used for many different industries and for each usage there will be different GHG emissions resulting depending on where the xylene is transported, the specific petrochemical production, product manufacturing and distribution processes, and disposal methods associated with each usage. For instance, if Xylene is shipped to China to manufacture plastics used in water bottles, the lifecycle GHG emission will be based on transportation of the xylene, manufacturing energy usage, transportation of the bottles, and whether end-users recycle or landfill the discarded bottles. There would be a much different lifecycle GHG impact if the xylene is used as a solvent domestically. Because this type of full lifecycle analysis is very difficult to perform and subject to many assumptions about how the Xylene will be used by other third-party industries, the DEIS should limit its cumulative impact GHG analysis to the known and quantifiable impacts associated with the on-site emission increase, and the off-site emission increases from increased electric usage and transportation.</p> <p>BACT Findings Should be Revisited</p> <p>The DEIS focuses its GHG regulatory analysis around compliance with the Washington State Clean Air Rule, even though that program isn't intended for new sources and doesn't take effect until 2020. However, under current regulations of the federal Clean Air Act, an emission increase over 75,000 tons of CO2 is subject to New Source Review (NSR) by the Dept of Ecology and Ecology's regulations require Best Available Control Technology (BACT) be employed. We thank Skagit County for including leak detection and repair as an important BACT requirement.</p>	
Ch04-190	Sandy Robson	<p>In reviewing the Draft EIS (DEIS), there does not appear to be accurate calculations for carbon pollution. The DEIS identifies a that there will be a very large increase in air and climate pollution if this project were permitted and operating, while claiming unverifiable carbon offsets as mitigation for the aid and climate</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p>

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		<p>pollution. This pollution must be accurately calculated and completely mitigated in order to ensure that Washington state can adequately meet its goals to act on climate change. Meeting those goals is vital to human health, environmental health, and animal and marine life health.</p>	<p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Ch04-191	Sustainable Connections, Opportunity Council, Jeff Aslan, Ross Quigley	<p>Off-site GHG Mitigation Should be Employed to Reduce Impacts</p> <p>The DEIS does a great job of summarizing the current scientific research on climate change and the need for reducing greenhouse gas emissions on a global scale. When a single project like this increases GHG emissions by an amount that exceeds the annual emission from all of the passenger vehicles in Skagit County combined, measures to reduce GHG should be employed either as a permit condition or as a voluntary measure. Sustainable Connections, in partnership with Opportunity Council operates the Community Energy Challenge (CEC). This program provides subsidized energy audits, project assistance and incentives for homeowners and business owners to invest in energy efficiency and renewable energy. We have successfully mitigated carbon emissions associated with another refinery's expansion in the past. At the same time that greenhouse gasses are reduced through the CEC, living wage jobs are created for local contractors. We have served over 600 businesses and 2400 homes in Whatcom, Skagit, Island and Sand Juan counties, and at the same time have generated over \$18 million in economic activity. In closing, we ask you to take a different approach to analyzing the greenhouse gas emissions associated with this project, and if the impacts are substantial, proposing a mitigation strategy that benefits the local community and creates jobs.</p>	<p>Additional analysis of GHG emissions and potential mitigation measures are discussed in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-192	Washington Physicians for Social Responsibility, Bruce Amundson, Emily	<p>Climate Change:</p> <p>Tesoro's mitigation plan is based on an inaccurate application of the Clean Air Rule. The draft EIS accurately identifies a significant emissions impact of 389,000 metric tons of greenhouse gases per</p>	<p>Additional analysis of GHG emissions and potential mitigation measures are further discussed in Section 3.3 of this Final EIS, including a discussion of the Washington Clean Air Rule. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>

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	Peterson, Laura Skelton	<p>year, mostly from onsite increases in emissions. Tesoro has proposed an unverifiable reduction in emissions based on the fact that the product will be shipped out of state for use in Asian plastic manufacturing. This is an inappropriate application of the state's Clean Air Rule. Shipping plastic precursors, and thus their process emissions, offshore is not a real solution to climate change; this should not be counted as a net reduction.</p> <p>The United States made a commitment to reduce global greenhouse gas pollution by signing onto the United Nations Paris Agreement in 2016. The risk of health consequences of global climate change include the spread of tropical infectious diseases, catastrophic weather events, ground level ozone, and food and water shortages worldwide- with disproportionate effects on lower-income populations and countries. The climate effects and subsequent long-term adverse health consequences from this project are sufficient reason to reject this proposal. The final EIS should not include a reduction in combustion emissions in the state of Washington as an acceptable greenhouse gas emissions offset. Climate change is a global issue and Washingtonians are made more vulnerable to the negative health impacts of climate change by greenhouse gas emissions in any area of the world.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch04-193	Virginia Wolff	<p>GHG emissions calculations In calculating GHG emissions of the xylene production component of Tesoro's proposal, the DEIS claims: "The proposed project's facility GHG emissions would be approximately 389,000 metric tons per year from stationary combustion and fugitive emissions on-site, as well as electricity usage and transportation." The DEIS factors in a GHG emissions credit of 695,000 metric tons per year because the approximately 5,200 barrels of fuel production per day that would be converted to xylene product would be removed from the U.S. fuels market, and not burned on the roads of Washington State. The GHG emissions from transporting xylene beyond the offshore boundary 12 nautical miles west of Neah Bay, and the emissions that result from converting it to end products across the Pacific Ocean, are omitted since they would happen outside the artificially designed boundaries of the project.</p>	<p>Additional analysis of GHG emissions and potential mitigation measures are further discussed in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p> <p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>The DEIS claims the net GHG emissions of the xylene production portion of this project would be a reduction of 306,000 metric tons per year. This logic makes a mockery of the concept of “cumulative impacts.” The proponent is allowed to claim credit for what is not burned here, but not held responsible for emissions from end use of their product elsewhere because of artificially chosen geographic limits of the “study area”. Without the emissions credit, the GHG emissions from the xylene production proposal would be significant, and Tesoro should be held responsible to mitigate for the 389,000 metric tons of GHG emissions per year the project would create.</p>	
Ch04-194	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Community Energy Challenge, Sustainable Connections, Friends of the Columbia Gorge, United Steelworkers Local 12-591, Northwest Washington</p>	<p>In summary, we are asking that the Final EIS: 1) be revised to more accurately account for greenhouse gas impacts from the proposed project,; 2) consider local clean energy projects as mitigation for these greenhouse gas emissions;</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>

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	<p>Central Labor Council, Laura Ackerman, Alyssa Barton, Stephanie Buffum, Tom Glade, Stephanie Hillman, Evergreen Islands, Michael Lang, Derek Long, Regna Merritt, Laura Ponzio, Ross Quigley, Alex Ramel, Joelle Robinson, Laura Skelton, Michele Stelovich, Eddy Ury, George Welch, Virginia Wolff, Gordon Zurn</p>		
Ch04-195	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Community Energy Challenge, Sustainable Connections, Friends of</p>	<p>Discussion of Proposed Greenhouse Gas (GHG) Mitigation</p> <p>The DEIS identifies anticipated annual GHG emissions increases from the project of 352,659 metric tons of CO2e emissions as well as 435 metric tons from fugitive emissions, 28,087 from electricity use and 8315 metric tons from transportation. Total GHGs are projected to be 389,496 metric tons of CO2e/year which exceeds the GHG reporting and mitigation thresholds that Ecology has established in their guidelines (10,000/25,000 tpy for reporting and mitigation respectively).</p> <p>The DEIS suggests a unique approach to GHG emissions offsets:</p> <p>The proposed project would convert fuel blending stock into xylene production that will take a portion of fuel produced at the refinery and convert it into petrochemical feedstock, thereby removing it from the U.S. fuels market. A portion of these fuels are typically produced in the state of Washington. This reduction in fuels production will constitute a reduction in combustion emissions that typically occur in the state of Washington. The fuels reduction will reduce NOx, CO, VOC, toxic air pollutants, and GHG emissions. Tesoro Anacortes Refinery has disclosed that approximately 5,200 barrels of fuel production per day would be converted to xylene product (Tesoro 2017). The fuels reduction</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding technology alternatives, such as cogeneration and combined heat and power, is discussed in Section 3.2 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS, including a discussion about compliance with Washington’s Clean Air Rule. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>

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	<p>the Columbia Gorge, United Steelworkers Local 12-591, Northwest Washington Central Labor Council, Laura Ackerman, Alyssa Barton, Stephanie Buffum, Tom Glade, Stephanie Hillman, Evergreen Islands, Michael Lang, Derek Long, Regna Merritt, Laura Ponzio, Ross Quigley, Alex Ramel, Joelle Robinson, Laura Skelton, Michele Stelovich, Eddy Ury, George Welch, Virginia Wolff, Gordon Zurn</p>	<p>could create a credit for GHG emissions as the Clean Air Rule includes fuels produced at the refineries.</p> <p>This approach does not follow established guidelines for determining credits for GHGs. Skagit County appears to acknowledge that this approach is unproven and controversial with the statement:</p> <p>Skagit County recognizes that Tesoro’s proposed strategy to reduce GHG emissions to comply with the Clean Air Rule has not been reviewed or approved by Ecology. After receiving input from Ecology, Tesoro’s proposed compliance strategy may change. Regardless of the methodology used, Skagit County recognizes that Tesoro’s emissions will ultimately be reduced as required under the Clean Air Rule.</p> <p>There are established standards for accounting for Greenhouse Gas reductions. The most commonly used and well regarded of them include The Greenhouse Gas Project Protocol (http://www.ghgprotocol.org/project-protocol) published by the World Resources Institute and the World Business Council for Sustainable Development and ISO 14064 published by the International Standards Organization (https://www.iso.org/standard/38382.html). These standards (and most others) agree that any greenhouse gas mitigation or offset project must be:</p> <p>1. Real 2. Verifiable 3. Additional and 4. Permanent. The proposed offset for this project may be verifiable, but it does not appear to achieve any of these other critical standards.</p> <p>Additionally, the information presented in the DEIS about the greenhouse gas calculation appears to be inconclusive. We request that the proponent and co-leads clarify the information about the greenhouse gas calculations, including the following:</p> <ul style="list-style-type: none"> o The information about the reduction should be transparent and accurate: Based on the DEIS, it is not clear that this offset will result in a total reduction in the GHG emissions occurring either in Washington State or anywhere in the world. It seems quite likely that Tesoro will increase the emissions on site, and another 	

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		<p>refinery will back fill the demand in-state. Should this occur, this emissions reduction could simply be an accounting trick that moves these emissions off of Tesoro's books and not a real reduction.</p> <p>o If there actually is a reduction, and the emissions from the fuel that Tesoro no longer produces are not replaced by another provider, then it is because demand for fuel in Washington State has declined. To the extent that this is true it is likely a result of changes made in corporate fuel economy standards, vehicle electrification, mass transit and individual driver choices to use transportation alternatives. These changes would all be the case in the absence of Tesoro's decision to shift production away from producing commodity fuels for Washington State, and therefore the emissions reduction is not additional. In a sense, Tesoro appears to be claiming credit for these reductions, which they had little or nothing to do with.</p> <p>o Assurance on the duration of the reduction: Even if there is a verifiable, real, additional reduction, no evidence has been offered that the reduction will be permanent. There is no barrier to Tesoro increasing production of commodity fuels in the future while continuing to use the steam plant, MVEC and other source of increased CO2 emissions. This credit does not meet the test of being permanent.</p> <p>We therefore ask that Ecology and Skagit County work together to ensure that any offset program used as mitigation for this project demonstrate, to commonly accepted standards, that the reduction is real, that the reduction can be verified on an ongoing basis, that the reduction would not have happened in the absence of the mitigation and that it will be permanent and enforceable. We ask that the mechanism for achieving these standards be defined in the FEIS.</p> <p>Alternative GHG mitigation proposal</p> <p>The signatories believe that greenhouse gas mitigation ought to be done in a way that not only offsets the carbon pollution, but that also creates jobs, economic development and infrastructure in our community. In 2012, the Northwest Clean Air Agency required a</p>	

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		<p>GHG mitigation program be established for increased greenhouse gas emissions resulting from the BP refinery's ultralow sulfur diesel project. BP paid approximately \$4.5 million dollars in mitigation funds.</p> <p>We propose that an alternative mitigation be developed for the full greenhouse gas footprint of the project that builds on this experience. The Northwest Clean Air Agency used the BP funds to pay for several mitigation projects. One of those projects, the Community Energy Challenge, has been particularly successful and has the advantage of being expandable if additional funding is made available.</p> <p>In short, the Community Energy Challenge works with homeowners and small business owners in the four-county region to develop cost-effective energy efficiency projects for residential (single and multi-family) and commercial buildings. Projects range from heating system upgrades to lighting system replacement to building shell and envelope measures. The program managers vet local contractors and the majority of the work is completed by private companies based in the region. The program managers also ensure that these contractors are providing living wage rates for their employees. Quality assurance on 100% of projects is in place to verify that anticipated emission reductions will be achieved.</p> <p>Depending on the details of the project, the program generally provides a partial grant to the building owner for some of the cost, but the building owners pay the majority of the project cost; this means that limited funds are stretched to enable the maximum number of mitigation projects.</p> <p>To date the Community Energy Challenge has developed projects totaling over \$18,000,000 in local economic activity, providing a steady stream of project work for dozens of local contractors and construction industry tradespeople. Since 2010, they have worked to cut energy costs in more than 2400 homes and more than 600 small businesses.</p> <p>We urge Skagit County, Tesoro and the Northwest Clean Air Agency to coordinate with the managers of the Community Energy</p>	

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		<p>Challenge to develop an effective alternative GHG mitigation program that will offset the impacts of Tesoro’s proposed project while improving local building stock and creating local jobs.</p> <p>It also seems likely that a significant GHG reduction could be achieved were Tesoro to install a cogeneration system in place of the proposed steam boiler. Such a system would produce usable electricity in addition to process steam. We note that other refineries in the region utilize cogeneration facilities. We request that this alternative be fully evaluated in the final EIS.</p> <p>We ask that the final EIS consider at least these, and possibly other alternative mitigation plans based on local energy efficiency and/or clean energy production and that the FEIS articulate the environmental impacts as well as the local economic, employment and social impacts that would result from such mitigations.</p>	
Ch04-196	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Vessel Shipments Emissions are not included in the Proposed Project Emissions, though they are modeled in the Draft EIS (Table 412) at 0.9 tpy SO 2 from unloading. Emissions from vessels at berth ("dockside") are considered primary emissions for applicability purposes, as a result of a court decision in NRDC v. EPA, 725 F.2d 761 (D.C. Circuit 1984). If onsite emissions from dockside reformate vessels unloading (as a direct operation requirement for the proposed project) are added to the projected stationary source emissions, this brings the total increases above both the SER and NAAQS. The CPUP, all accounted for, may set Tesoro in violation of Regional Haze requirements. The FEIS should include these sources.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards.</p> <p>Project SO₂ emissions have been further analyzed in Section 3.3 of this Final EIS. Sulfur dioxide emissions during vessel unloading is discussed in Section 3.3.1 and ocean acidification due to SO₂ emissions is discussed in Section 3.3.5 of this Final EIS.</p>

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Ch04-197	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Climate Impacts GHG Emissions Are Significant</p> <p>The DEIS identifies anticipated annual greenhouse gas (GHG) emissions increases from the project of 352,659 metric tons of CO₂e emissions as well as 435 metric tons from fugitive emissions, 28,087 from electricity use and 8315 metric tons from transportation. Total GHGs are projected to be 389,496 metric tons of CO₂e/year which exceeds the Ecology’s reporting and mitigation thresholds of 10,000 and 25,000 tpy respectively.</p> <p>The Proposed GHG Offset is Inappropriate The DEIS suggests a unique approach to GHG emissions offsets:</p> <p>The proposed project would convert fuel blending stock into xylene production that will take a portion of fuel produced at the refinery and convert it into petrochemical feedstock, thereby removing it from the U.S. fuels market. A portion of these fuels are typically produced in the state of Washington. This reduction in fuels production will constitute a reduction in combustion emissions that typically occur in the state of Washington. The fuels reduction will reduce NO_x, CO, VOC, toxic air pollutants, and GHG emissions. Tesoro Anacortes Refinery has disclosed that approximately 5,200 barrels of fuel production per day would be converted to xylene product (Tesoro 2017).</p> <p>The fuels reduction could create a credit for GHG emissions as the Clean Air Rule includes fuels produced at the refineries. (chapter 4) This approach does not follow established guidelines for determining credits for GHGs. Skagit County appears to acknowledge that this approach is unproven and controversial with the statement:</p> <p>Skagit County recognizes that Tesoro’s proposed strategy to reduce GHG emissions to comply with the Clean Air Rule has not been reviewed or approved by Ecology. After receiving input from Ecology, Tesoro’s proposed compliance strategy may change. Regardless of the methodology used, Skagit County recognizes that Tesoro’s emissions will ultimately be reduced as required under</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding technology alternatives, such as cogeneration and combined heat and power, is discussed in Section 3.2 of this Final EIS. Additional information on proposed project GHG emissions and potential mitigation is presented in Section 3.3 of this Final EIS, including a discussion about compliance with Washington’s Clean Air Rule. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>

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		<p>the Clean Air Rule. (chapter 4)</p> <p>There are several established standards for accounting for GHG reductions. The most commonly used and well regarded of them include The Greenhouse Gas Project Protocol (http://www.ghgprotocol.org/projectprotocol) published by the World Resources Institute and the World Business Council for Sustainable Development and ISO 14064 published by the International Standards Organization (https://www.iso.org/standard/38382.html). These standards (and most others) agree that any greenhouse gas mitigation or offset project must be: 1. Real 2.Verifiable 3. Additional and 4. Permanent. The proposed offset for this project may be verifiable, but it does not appear to achieve any of these other critical standards.</p> <p>The FEIS should clarify the basis for any greenhouse gas offsets, including the following:</p> <p>? The information about the reduction should be transparent and accurate. Based on the DEIS, it is not clear that this offset will result in a total reduction in the GHG emissions occurring either in Washington State or anywhere in the world. It seems quite likely that Tesoro will increase the emissions onsite as a result of the steam plant and other identified sources, and another refinery will back fill the demand for combustible fuels instate. Should this occur, this emissions reduction could simply be an accounting trick that moves these emissions off of Tesoro's books.</p> <p>? Analysis of attribution should be included. If there actually is a reduction, and the emissions from the fuel that Tesoro no longer produces are not replaced by another provider, then it is because demand for fuel in Washington State has declined. To the extent that this is true it is likely a result of changes made in corporate fuel economy standards, vehicle electrification, mass transit and individual driver choices to use transportation alternatives. These changes would all be the case in the absence of Tesoro's decision to shift production away from producing commodity fuels for Washington State, and therefore the emissions reduction is not additional. In a sense, Tesoro appears to be claiming credit for</p>	

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		<p>these reductions with which they had little or nothing to do.</p> <p>? Assurance on the duration of the reduction: Even if there is a verifiable, real, additional reduction, no evidence has been offered that the reduction will be permanent. There is no barrier to Tesoro increasing production of commodity fuels in the future while continuing to use the steam plant, MVEC and other source of increased GHG emissions. This credit does not meet the test of being permanent.</p> <p>We therefore ask that Ecology and Skagit County work together to ensure that any offset program used as mitigation for this project demonstrate that the reduction is real, that the reduction can be verified on an ongoing basis, that the reduction would not have happened in the absence of the mitigation and that it will be permanent and enforceable. We ask that the mechanism for achieving these standards be defined in the FEIS. We also ask that any offset that Tesoro is credited with be verified and that the FEIS define the third party standard by which it will be verified.</p> <p>Alternative GHG Mitigation</p> <p>The signatories believe that greenhouse gas mitigation ought to be done in a way that not only offsets the carbon pollution, but that also creates jobs, economic development and infrastructure in our community. In 2012, the Northwest Clean Air Agency required a GHG mitigation program be established for increased greenhouse gas emissions resulting from the BP refinery's ultralow sulfur diesel project. BP paid approximately \$4.5 million dollars in mitigation funds.</p> <p>We propose that an alternative mitigation be developed for the full GHG footprint of the Tesoro project that builds on this experience. The Northwest Clean Air Agency used the BP funds to pay for several mitigation programs. One of those, the Community Energy Challenge, has been particularly successful and has the advantage of being expandable if additional funding is made available.</p> <p>In short, the Community Energy Challenge (www.communityenergychallenge.org) works with homeowners</p>	

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		<p>and small business owners in the fourcounty region to develop costeffective energy efficiency projects for residential (single and multifamily) and commercial buildings. Projects range from heating system upgrades to lighting system replacement to building shell and envelope measures. The program managers vet local contractors and the majority of the work is completed by private companies based in the region. The program managers also ensure that these contractors are providing living wage rates for their employees. Quality assurance on 100% of projects is in place to verify that anticipated emission reductions will be achieved. Depending on the details of the project, the program generally provides a partial grant to the building owner for some of the cost, but the building owners pay the majority of the project cost; this means that limited funds are stretched to enable the maximum number of mitigation projects.</p> <p>To date the Community Energy Challenge has developed projects totaling over \$18,000,000 in local economic activity, providing a steady stream of project work for dozens of local contractors and construction industry tradespeople. Since 2010, they have worked to cut energy costs in more than 2400 homes and more than 600 small businesses.</p> <p>We urge Skagit County, Tesoro and the Northwest Clean Air Agency to coordinate with the managers of the Community Energy Challenge to develop an effective alternative GHG mitigation program that will offset the impacts of Tesoro’s proposed project while improving local building stock and creating local jobs.</p> <p>We ask that the final EIS consider at least these, and possibly other alternative mitigation plans based on local energy efficiency and/or clean energy production and that the FEIS articulate the environmental impacts as well as the local economic, employment and social impacts that would result from such mitigations.</p> <p>GHG Reduction through Cogeneration Should Be Considered</p> <p>It also seems likely that a significant GHG reduction could be achieved were Tesoro to install a cogeneration system in place of the proposed steam boiler. Such a system would produce usable electricity in addition to process steam. The total usable energy</p>	

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		<p>created by a cogeneration plant is much greater as a percentage of the fuel used in production; cogeneration is a much more efficient technology. Tesoro should be required to utilize the best available technology. We note that other refineries in the region, including the adjacent Shell Puget Sound Refinery, utilize cogeneration facilities. We request that this alternative be fully evaluated in the final EIS.</p>	
Ch04-198	Tesoro Anacortes Refinery, Rebecca Spurling	<p>J. The FEIS Should Clarify That There Are No GHG Emissions From Any Spill.</p> <p>Tesoro agrees with the County's conclusion that the proposed project would reduce net GHG emissions by replacing some of the refinery's current fuel production with xylenes production.⁷⁵ Therefore, the proposed project would not contribute to cumulative climate impacts.⁷⁶</p> <p>The FEIS should be clear that there will be no emissions of GHGs from any type of spill because mixed xylenes and medium reformate do not contain any regulated GHGs.⁷⁷ The conversion of compounds such as xylene into carbon dioxide as a result of reactions occurring in the atmosphere is not a GHG emission. As a result, there will be no GHG impacts resulting from any spills associated with the proposed project.</p>	<p>The Draft EIS discusses potential GHG emissions in the event of spill in Section 4.4.4.2. Additional information on the potential of GHG emissions from a worst-case spill event is discussed in Section 3.3.2 of this Final EIS.</p>
Ch04-199	Evergreen Islands	<ul style="list-style-type: none"> • What are the best practices for national energy policy, fossil fuels vs. renewable energy (wind, solar, biofuels), and energy conservation? 	<p>Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.</p>
Ch04-200	Orca Network, Howard Garrett	<p>We ask that the Final Environmental Impact Statement include:</p> <p>...</p> <ul style="list-style-type: none"> • A full account of all greenhouse gas emissions from the project, including from shipping and subsequent manufacture operations. 	<p>Potential GHG emissions from the proposed project and potential mitigation have been further analyzed in Section 3.3 of this Final EIS. Information regarding agencies responsible for GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Ch04-201	Talitha Jones	<p>How does this project conform to the WA State Clean Air Rule, of January 2017? Under the Rule, major sources of greenhouse gases must limit and reduce carbon pollution. The EIS says emissions</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive</p>

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		<p>from the expansion, "could" be offset, but doesn't outline a specific plan for doing so, backed up with data. If this expansion is to go forward, its impact on the state's ability to meet climate change goals should be addressed, and a mitigation plan, and assurance of compliance with that plan, should be in place.</p>	<p>measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-202	Barbara Tuttle	<p>I would hope that the full greenhouse gas emissions will also be considered as a significant impact.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-203	Mike Allen	<p>The Draft EIS for the Tesoro Anacortes Xylene Proposal is missing accurate calculations for carbon pollution</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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			Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.
Ch04-204	AJ Kuntze	I SUPPORT requirements that Tesoro offset 100% of the Greenhouse gasses it produces with local clean energy projects. Shipping the "problem" to Asia does not reduce the greenhouse gases that go into the atmosphere.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-205	Richard Johnson	The draft EIS identifies a substantial increase in climate pollution from ongoing operations for this project while claiming unverifiable carbon offsets as mitigation. This pollution must be accurately mitigated to make sure the state can meet its goals to act on climate change. Any increase in climate pollution should be fully offset by supporting mitigation projects in Northwest Washington.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-206	Deejah Sherman-Peterson, Ron	In the interest of mitigating climate change by limiting greenhouse gas emissions, please do not allow any more fossil fuels to be used	The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in

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	Sherman-Peterson	at this refinery, i.e., no increase in oil trains. We must reduce fossil fuel use rather than increase it.	<p>Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. The proposed project would not result in an increase in train traffic and associated emissions.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-207	David Kershner	The draft EIS identifies a significant increase in greenhouse gas emissions from the project but does not identify verifiable offsets. The final EIS needs to identify verifiable offsets in order to adequately mitigate these greenhouse gas emissions.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-208	United Steelworkers Local 12-591, George Welch, Gordon Zurn	<p>GREENHOUSE GAS EMISSIONS</p> <p>We are also concerned that the greenhouse gas (GHG) emission projections used in the Environmental Impact Statement process be accurate. Tesoro believes the project will result in a net decrease in GHG emissions. Environmental advocacy groups have suggested the opposite may be true. An independent study by a reputable and capable agency should be charged with providing an answer to this question, using reasonable measures and/or</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information</p>

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		<p>assumptions in their analysis. If it is determined that CPUP will result in an increase in GHG emissions, mitigation efforts such as was accomplished between the Northwest Clear Air Agency and BP Cherry Point refinery when that operation went forward with their Ultra Low Sulfur Diesel project, should be required.</p>	<p>regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-209	Camille Meehan	<p>I ask that your final EIS include the following as well as address any of my comments above:</p> <ul style="list-style-type: none"> • A full account of all (all parts, not just the convenient parts) green house gas emissions from the project. 	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-210	Sigrid Asmus	<p>It is imperative that all the matters listed below be included in and considered by those drafting the DEIS:</p> <p>...</p> <p>-- Account fully for the true environmental cost of all greenhouse gas emissions. Any mitigations or offsets must demonstrate that the reduction is genuine, scientifically verifiable, and that in addition that it will be permanent, and contains strong enforcement and prosecution language;</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>

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Ch04-211	Steve Garey	<p>TESORO CONTENDS THAT THE PROJECT WOULD RESULT IN A NET DECREASE IN GREEN HOUSE GAS EMISSIONS. AN EVALUATION OF THIS ISSUE BY A CAPABLE AND EXPERIENCED AGENCY SHOULD BE REQUIRED IN THE FINAL EIS TO CONFIRM THIS. IT IS OF COURSE ANOTHER BENEFIT IF THIS IS FOUND TO BE THE CASE. HOWEVER, EVEN IF IT IS DETERMINED THAT A SMALL NET INCREASE IN EMISSIONS IS REALIZED, THAT SHOULD BE MITIGATED IN WAYS THAT SUPPORT EVEN MORE LOCAL JOBS. CARBON OFFSET CREDITS SHOULD BE PURCHASED IF NECESSARY, SO AS TO SUPPORT MORE LOCAL JOBS IN ENERGY EFFICIENCY AND NEW CLEAN POWER INFRASTRUCTURE.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-212	Sigrid Asmus	<p>I ask the Skagit County board to include in its environmental assessment strong provisions requiring that accurate calculations for for the full extent of carbon pollution be made These provisions must be mandatory, because the draft EIS identifies a huge increase in air and climate pollution from ongoing operations for this project, while yet claiming that totally inadequate and unacceptably unverifiable carbon offsets are the _only_ mitigation. Once carbon enters the atmosphere, it can never be removed -- where is the offset for that?</p> <p>This massive source of new potential pollution, if it is allowed, must be accurately calculated and regulated now, so that the true cost to Washington State's economy, fisheries, Tribes, tourism, and health can be calculated. It is essential that the board require full identification of the massive threat represented by the Tesoro proposal. Without that assessment, you, as the our representative for Washington State, would allow Tesoro to shift all costs of its damages, as well as its mitigation costs and responsibility, directly and entirely on to Washington State.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-213	Teresa Catford	<p>A few more jobs won't tip the scale in Tesoro's favor when on balance the negative consequences are so high: 1) increased green house gas emissions despite the claim of carbon offsets which are</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive</p>

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		unverified;...	<p>measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-214	Ruth Allen	The Draft EIS for the expansion of operations at the Tesoro Anacortes Refinery does not provide adequate assessment of greenhouse gas emissions,	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-215	Ed Gastellum	As the EIS states that it will reduce green house gases by 380,000 tons a year, how do we really know that this is the truth? I believe an in-depth analysis conducted by an independent, unbiased second party would be more re-assuring if this contention is true.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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			Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.
Ch04-216	Ed Gastellum	<p>In an article written by KUOW News by John Ryan in January 29, 2016, The Department of Ecology's top ten polluter's lists the Tesoro Refinery is at Number 6 for Climate pollution emissions. Since, Tesoro claims that it will reduce 380,000 tons of carbon dioxide, their standing in the top ten should drop in the future. But what is being glossed over and omitted from the draft EIS described above, Tesoro's standing could possibly increase in the future.</p> <p>[Table of Washington's Top 10 Climate Polluters, 2014 and Emissions]</p> <p>SOURCE: Washington Department of Ecology</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-217	Court Olson	<p>Finally, there is the global warming and climate change concern. To save the planet, we must reduce our use of fossil fuels rapidly -- not expand their use as Tesoro proposes.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-218	Bob Zeigler	<p>The document states that because of natural gas or treated fuel gas as a fuel and good combustion technology would minimize</p>	<p>The proposed project's natural gas usage, emissions, comparison to air quality standards, and planned emission controls are</p>

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		<p>Green House Gas and sulfur dioxide emissions. What is the increase in amount of natural gas used as fuel and the line out the dock? What is the source and amount of that natural gas to be consumed and what venting of it would occur? At March Point near the refinery people have experienced headaches already from vented gases at the facility, Natural Gas in its production and transport and venting that occurs can release significant amounts of greenhouse gases so while less carbon dioxide than coal or oil, it is not a neutral impact product on climate change.</p> <p>The USEPA has adopted new, more stringent fuel standards that require lowering the sulfur content in gasoline, which went into effect January 1, 2017.</p>	<p>described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>The Draft EIS discusses the increase in use of natural gas as a result of the proposed project in Section 2.8.4.1 and the potential impacts of this use on the local natural gas supply in Section 8.4.2. Natural gas venting was accounted for in the fugitive emissions from the proposed project components. See Section 4.4 of the Draft EIS for a discussion of fugitive emissions. The Draft EIS does not account for venting associated with the natural gas brought to the refinery through transmission lines owned and operated by Cascade Natural Gas. These transmission lines have venting stations that are used when there is maintenance on the transmission line or if the transmission line is over pressured for any reason. Natural gas transmission lines in the Pacific Northwest typically do not over pressure due to a lack of high ambient temperatures required for this process to occur. Therefore, natural gas transmission line venting is considered an insignificant contributor to GHG emissions.</p> <p>One of the objectives of the proposed project is to improve the refinery's capability to deliver cleaner transportation fuels per the USEPA requirements. See Section 1.2 of the Draft EIS. The new fuel standards are referred to by the USEPA as "Tier 3" standards. The proposed project upgrades would lower the sulfur content in gasoline to comply with the new federal standards.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-219	Alena Wheary	- Account fully for all greenhouse gas emissions. Any mitigation or offsets should demonstrate that the reduction is real, verifiable, is	The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in

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		additional and that it will be permanent and enforceable;	<p>Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-220	Edward Chadd	<p>Please ensure that the final EIS:</p> <p>...</p> <p>Accounts fully for all greenhouse gas emissions. Any mitigation or offsets should demonstrate that the reduction is real, verifiable, additional, permanent and enforceable;</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-221	Ellen Johnson	The people's goal is to be carbon free (or at least carbon neutral) by 2050. THIS is not how we get there! Please reconsider.	Thank you for your comment.
Ch04-222	Linda Gillaspay	Anything that can be done to limit fossil fuel consumption should be done. The sooner our transition to renewable's, the sooner our planet will be able to start to cool. Please protect our planet and our beautiful Pacific Northwest.	Thank you for your comment.

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Ch04-223	Jeanne Martin	I feel strongly that our country, and the world, need to divest from fossil fuels. Expanding the Tesoro Refinery does just the opposite. Not only do I have concerns about possible spills of xylene or other chemicals, but, ultimately, expanding this refinery will contribute to carbon dioxide in the air, and hence, global warming. Our country, and the world, needs to be developing clean renewable sources of energy, not expanding existing fossil fuel operations.	Thank you for your comment.
Ch04-224	Carolee Colter	Then there's the matter of contributing to global warming. The DEIS does not adequately address my concerns.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-225	Carol Sullivan	<p>Please help protect what we have from the dangers listed below.</p> <p>...</p> <p>Air pollution is another concern, and I feel that Tesoro should be required to offset 100% of their on-site greenhouse gas increases with local clean energy projects.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in</p>

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			Chapter 4 of this Final EIS.
Ch04-226	Ben Pfeiffer	Please revise the DEIS to include an assessment of the global long-term effects of this proposed facility on the level of greenhouse gases in the atmosphere. Future generations need protection from climate catastrophes. The expansion of our hydrocarbon infrastructure is virtually committing us to higher and higher levels of these gases. This must stop.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-227	Bob Carson	In my opinion, global climate change is the greatest crisis humanity has ever faced. Therefore we should do nothing to support the fossil fuel industry. Their materials and products must be minimized because of global warming, ocean acidification, oil spills, gas explosions, hazardous coal mining, and poisonous products.	Thank you for your comment.
Ch04-228	Marilyn Boyd	Climate change dictates that we should be doing everything possible to decrease CO2.in our atmosphere.	Thank you for your comment.
Ch04-229	Erin Baker	https://www.carbonbrief.org/analysis-four-years-left-one-point-five-carbon-budget	Thank you for your comment.
Ch04-230	Benjamin Sibelman	Account fully for all greenhouse gas emissions. Any mitigation or offsets should demonstrate that the reduction is real, verifiable, additional (not just something they would have done anyway) and that it will be permanent and enforceable.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are</p>

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			<p>subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-231	Vicki Thomas	<p>Currently missing from the EIS are accurate calculations for carbon pollution. The draft EIS does not quantify the increase in air and climate pollution nor does it have verifiable carbon offsets for proposed mitigation. This oversight must be remedied.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-232	Leslie Sharpe	<p>Accurate calculations for carbon pollution, and assurances that the project won't increase crude oil train traffic, are missing from the draft EIS.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in</p>

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			Chapter 4 of this Final EIS.
Ch04-233	Tom Cole	<p>I ask that the FEIS:</p> <p>...</p> <p>Account FULLY for all greenhouse gas emissions. This is both of local and global significance.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-234	Joan Poor	Please assure that the final EIS ... fully accounts for all greenhouse gas emissions from the project,	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-235	Lael White	The draft EIS falls short on key measures including an adequate assessment of greenhouse gas emissions	The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.

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			<p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-236	Jess Wallach	<p>Moreover, the draft EIS does not include...the growing threats posed by climate change impacts (last summer's wildfires in the eastern part of our state, for instance).</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. The proposed project's cumulative impacts on climate change are discussed in Section 4.8 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-237	Donna FriedmanRN	<p>All of this will produce more heat, melting more ice, creating more flooding & damaging the lives of wildlife.</p>	<p>Thank you for your comment.</p>
Ch04-238	Jack Herbert	<p>We all know tat we need to leave over 80% of fossil fuels in the gounrd, that we need to stop any expansion of fossil fuel infrastructure and use, that we need to wind its use down rapidly between 2017 and 2022 (International Energy Agency Report, 2012).</p>	<p>Thank you for your comment.</p>
Ch04-239	Amanda Sue Rudisill	<p>Their plan would mean carbon pollution equal to adding another 80,000 cars to the road.</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in</p>

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			<p>Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-240	Jane Stackhouse	Accounts fully for all greenhouse gas emissions throughout the supply chain.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-241	Gretchen Allison	Also, at a time when the world is grappling with climate change it is important to know the Co2 emissions from this project.	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at</p>

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			<p>the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch04-242	Beverly Faxon	<p>In addition, I am quite concerned about increased greenhouse gas emissions that might be associated with this project. Environmental impact statements cannot be complete without such an assessment in our current ecological climate.</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>GHG emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for regulating GHG emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>

Chapter 5: Freshwater Resources

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Ch05-001	Veronica Bush	While air may not be the number one contributing factor, xylene is known to leak into the soil, surface water or ground water where it may remain for months or more before it breaks down into other chemicals.	<p>The proposed xylene storage systems and pumping areas were designed to include secondary containment around all tanks so that any xylene that leaked would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's WWTP (see Section 2.8.5 of the Draft EIS). Leak detection systems for tanks and piping would alert workers in the event of a spill and there are spill measures in place to quickly clean up any spills. Refinery personnel are trained in spill prevention and response. If the secondary containment failed, the spilled material would be routed to the WWTP. Further details about spill prevention and response measures at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls – Section 2.7.6 • Operational site controls – Section 2.8.5 • Potential impacts on geological resources (including soil erosion) – Section 3.3.2 • Potential impacts to groundwater – Section 5.4.2.3 • Freshwater resources including surface water and wetlands – Sections 5.3.2.3 and 5.5.2.3 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A
Ch05-002	Washington State Department of Ecology, Stephanie Barney	Stormwater runoff can have a significant impact on water quality, introducing sediment and other pollutants into waters of the state. Such pollutants can impair or eliminate aquatic habitat and prevent such waters from having multiple beneficial uses (e.g., fishing, swimming and drinking).	<p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery's wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge</p>

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			<p>Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch05-003	Washington State Department of Ecology, Stephanie Barney	<p>From the SEPA register, it appears this project may be subject to Ecology’s National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (CSGP).</p> <p>NPDES Construction Stormwater General Permit (CSGP)</p> <p>Permit coverage is necessary if construction activity meets the following criteria:</p> <ul style="list-style-type: none"> • Clearing, grading, and/or excavation results in a disturbance of one or more acres and discharges stormwater to surface waters of 	<p>The proposed project is subject to NPDES permitting, as discussed in Sections 5.1 and 5.3 of the Draft EIS. The required permits for the proposed project are listed in Table 1-1 in Section 1.4.5 of the Draft EIS. This table indicates a Construction Stormwater General Permit is required under Ecology’s NPDES program.</p>

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		<p>the State.</p> <ul style="list-style-type: none"> • Clearing, grading, and/or excavation on sites smaller than one acre that are a part of a larger common plan of development or sale also require coverage if the common plan of development will ultimately disturb one acre or more and discharge stormwater to surface waters of the State. • Forest practices, (including but not limited to class IV conversions) that are a part of a construction activity that will result in a disturbance of one or more acres, and discharge to surface waters of the State. <p>Information regarding the NPDES Construction Stormwater General Permit can be found at: http://www.ecy.wa.gov/programs/wq/stormwater/construction/</p>	
Ch05-004	Alberta Finley	<p>The hazards of xylene are well documented: ... Gets into groundwater</p>	<p>The proposed xylene storage systems and pumping areas were designed to include secondary containment around all tanks so that any xylene that leaked would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's WWTP (see Section 2.8.5 of the Draft EIS). Leak detection systems for tanks and piping would alert workers in the event of a spill and there are spill measures in place to quickly clean up any spills. Refinery personnel are trained in spill prevention and response. If the secondary containment failed, the spilled material would be routed to the WWTP. Further details about spill prevention and response measures at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls – Section 2.7.6 • Operational site controls – Section 2.8.5 • Potential impacts on geological resources (including soil erosion) – Section 3.3.2 • Potential impacts to groundwater – Section 5.4.2.3 • Freshwater resources, including surface water and wetlands – Sections 5.3.2.3 and 5.5.2.3 • Existing operations and controls, process safety management, preventive measures and inspections, and oil

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			spill response – Appendix 2-A
Ch05-005	Carol Thibeau	<p>EIS draft did not include;</p> <p>...</p> <p>Contamination of additional groundwater runoff</p>	<p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery’s wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for</p>

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			regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.
Ch05-006	Lee First	<p>Stormwater is the number one source of pollution in urban areas of Western Washington, and the expanded 15 acre area for this project could result in 15 million gallons of additional stormwater runoff every year. According to the Draft EIS, only some of that additional stormwater will run to the facility's treatment systems, while 23 acres of disturbed land could drain through sheet flowing towards Fidalgo Bay which is already polluted and will also infiltrate to groundwater. So, we need a better analysis of how the loss of wetlands and draining ditches will impact stormwater flow and local wildlife and habitat. I'm also really concerned with -- if there was a leak in any of the new tanks. So, de-watering in the new tanks could result in a lowered water table. And the project area isn't identified as having an existing or potential saltwater intrusion.</p>	<p>Currently and during construction, runoff from the approximate 23.4 acres of land that would include the New Tank Area, Potential Temporary Laydown Area, and land near the North Texas Road Refinements drains through sheet flow toward Fidalgo Bay and infiltrates to groundwater. Some stormwater also drains to detention ditches where it would infiltrate to groundwater and/or evaporate.</p> <p>Once construction is complete and during operation of the proposed project, runoff from the developed portions of the proposed project would be directed into the facility's stormwater sewer system and discharged in accordance with the Tesoro NPDES Industrial Wastewater Discharge Permit (see Section 5.3.2.2 of the Draft EIS).</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery's WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil

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			<p>spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>The proposed project would be located in an area identified by Skagit County with potential or existing seawater intrusion (see Section 5.4.2 of the Draft EIS). Potential impacts to groundwater from dewatering during construction are discussed in Section 5.4.2.1 and potential impacts to wetlands are discussed in Section 5.5.2.1 of the Draft EIS.</p> <p>The proposed xylene storage systems and pumping areas were designed to include secondary containment around all tanks so that any xylene that leaked would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery’s WWTP (see Section 2.8.5 of the Draft EIS). Leak detection systems for tanks and piping would alert workers in the event of a spill and there are spill measures in place to quickly clean up any spills. Refinery personnel are trained in spill prevention and response. If the secondary containment failed, the spilled material would be routed to the WWTP. Additional information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch05-007	Alyssa Barton	<p>My comments pertain to water quality impacts today. The use of sulfolene is not adequately addressed in the DEIS. The DEIS merely indicates that sulfolene cannot be routed to the wastewater treatment plant and it requires separate measures. However, what are the risks of this chemical? What are the separate measures? How will it be handled? This is unclear. Tesoro indicates in its DEIS that industrial wastewater permit would be modified. Why is a new permit not required? A new permit may be required to address treatment of the new processed chemicals and the potential change in chemical composition of the wastewater effluent from Tesoro's wastewater treatment plant. This should be discussed and analyzed in the DEIS. The proposed new tanks area</p>	<p>Impacts to fresh water quality during construction and operation of the proposed project, or due to an unplanned event (e.g., spills), are discussed in Chapter 5 of the Draft EIS. The anticipated uses of sulfolane in the proposed project, as well as sulfolane spill prevention measures, and behavior of sulfolane if spilled are discussed in Section 2.8.3.1 of the Draft EIS.</p> <p>Spill response for potential spills of sulfolane was discussed in Section 2.8.3.1 of the Draft EIS. Changes to the existing NPDES permit and the capacity of the existing WWTP are discussed in Section 5.3.2.2 of the Draft EIS. See Section 9.6.2.1 of the Draft EIS for further information regarding the toxicity of sulfolane. Additional information regarding agencies responsible for</p>

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		<p>requires development of 18 undeveloped acres, an additional 15 -- a little more than 15 acres of impervious surfaces will be built as a result of this project. This could equate to over 11 million gallons of additional stormwater over a year. What will be done to mitigate for this additional stormwater? The DEIS also does not adequately examine potentially significant impacts that could arise because of the low groundwater table in the area. In the event of a leak or spill during construction or even during regular operations, groundwater depth as low as three feet below the surface in the construction areas may necessitate additional measures to prevent contamination. The immediate spill response promised by Tesoro may be difficult to impossible to clean up with the reformates and xylene tanks so close, if not directly in groundwater. For these reasons, we ask that you please recognize the far-reaching potential impacts of this project and that you conduct a proper environmental impacts analysis that fully quantifies these</p>	<p>regulating freshwater resources is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery's wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery's WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for</p>

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			<p>regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed xylene storage systems and pumping areas were designed to include secondary containment around all tanks so that any xylene that leaked would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's WWTP (see Section 2.8.5 of the Draft EIS). Leak detection systems for tanks and piping would alert workers in the event of a spill and there are spill measures in place to quickly clean up any spills. Refinery personnel are trained in spill prevention and response. If the secondary containment failed, the spilled material would be routed to the WWTP.</p> <p>Further details about spill prevention and response measures at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Potential Impacts on geological resources (including soil erosion) – Section 3.3.2 • Potential impacts to groundwater – Section 5.4.2.3 • Freshwater resources, including surface water and wetlands – Sections 5.3.2.3 and 5.5.2.3 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A
Ch05-008	Phyllis Dolph	The wetlands there cannot be mitigated. Mitigation does not work. It is a farce.	Neither the USACE nor the Washington State Department of Ecology took jurisdiction over the two Category IV wetlands that would be impacted by the proposed project, as discussed in Section 5.5.1 of the Draft EIS. Compensatory mitigation for filling the wetlands would not be required by the USACE or Ecology.
Ch05-009	Roberta Hutton	water pollution...is very disturbing.	Thank you for your comment.
Ch05-010	Evelyn Adams	xylene spilled on the soil can travel into the groundwater,	The Draft EIS analyzed potential impacts to groundwater from

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		contaminate drinking water, and remain for months before breaking down.	spills of xylene in Section 5.4.2.3 of the Draft EIS.
Ch05-011	Phyllis Dolph	Our drinking water would be polluted with benzene (a carcinogen that causes blood cancers, such as leukemia and Non-Hodgkin's lymphoma), toluene (a neurotoxin), hexane (neurotoxin), hydrogen sulfide (neuro and pulmonary toxin), polycyclic aromatic hydrocarbons (carcinogens), xylene (carcinogen) and other unknown toxic chemicals if a spill were to occur over the Skagit River.	The proposed project and refinery boundary is located outside of the Skagit River watershed. Potential impacts to freshwater resources from the proposed project are discussed in Chapter 5 of the Draft EIS. Only the commodity chemicals (sulfolane, aqueous ammonia, and perchloroethylene) would be delivered by truck, possibly over the Skagit River, as part of the proposed project. Potential impacts from increased truck traffic to deliver these chemicals are discussed in Section 9.4.2.2 of the Draft EIS. Based on expected usage rates and typical truck capacity, the proposed project would generate approximately 50 truck trips per year. Impacts associated with an accidental spill of materials transported via truck, such as a spill along the I-5 bridge over the Skagit River, are discussed in Section 9.6 of the Draft EIS.
Ch05-012	Stephen D Orsini	Due to Skagit County's terrible lack of protection of our sole source aquifer my well, operable for 50 years, has succumbed to sea water intrusion. By 2006, I had completed a whole house rain water catchment system to allow us to continue our year round residency of our family home. Each time there is an 'Upset' at a refinery, gas is flared. The VOCs carry down wind and are particularly subject fall with rain onto my catchment roof. Despite the fact I run all the rain water through carbon filters, I am not willing to further risk my family to exposure to xylene and its derivatives. No refinery runs without "Upsets".	Potential impacts to groundwater resources from the proposed project are discussed in Section 5.4.2 of the Draft EIS. The current VOCs and particulate matter coming from the refineries are not part of the proposed project. However, existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. The MVEC would significantly reduce the VOC emissions from the refinery and is designed to prevent emissions of xylenes. The MVEC unit is 99% efficient. This is described in Section 4.4.2.1 of the Draft EIS. Table 4-10 displays the toxic air pollutant modeling results and all are shown as less than Ecology's Acceptable Source Impact Level. However, during upset conditions, process units may need to shut down and their contents are sent to the flares. The flares are 98% efficient and eliminate most of the xylenes and VOC. The remaining emissions are dispersed by the elevated flares. Accounting for baseline air quality and proposed project emissions, the proposed project would comply with applicable air quality standards described in Section 4.4.2.1 of the Draft EIS. Additional information regarding agencies responsible for regulating emissions from new or modified sources at the

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			refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch05-013	Sara Holahan	<p>ES7.3 Freshwater Resources The EIS says two small “manmade” wetlands will be eliminated, but there is no recommended mitigation. These are manmade because they were created when the refinery wiped out previous natural wetlands. A replacement needs to be created. To state that impacted water would not reach Fidalgo Bay because ditches and wetlands are not hydrologically connected is not good science. Surface water will seep into the bay as it is very close and very sensitive.</p>	<p>Neither the USACE nor Ecology took jurisdiction over the two Category IV wetlands that would be impacted by the proposed project, as discussed in Section 5.5.1 of the Draft EIS. The two Category IV wetlands were not created as mitigation for previous impacts. Work within these areas does not require authorization from the USACE or Ecology and compensatory mitigation for filling the wetlands is not required. In addition, the two are man-made depressional wetlands consisting of grass-lined swales that do not meet the definition of wetlands under the County code (SCC 14.04.020).</p> <p>While it is true that there would be some loss of non-jurisdictional wetlands, these wetlands are of low quality and are not hydrologically connected to the other wetlands and are not connected to Fidalgo Bay. As described in Section 5.3 of the Draft EIS, BMPs in accordance with the Stormwater Management Manual for Western Washington would be in place during construction to prevent the release of sediment into surface waters, including surface waters within wetlands. As stated above, stormwater during construction would be managed in accordance with the construction SWPPP under the regulatory authority of Ecology. Information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch05-014	Joyce Lewis	<p>There was just another xylene spill contaminating water for 1,000's of people. We do NOT NEED this to happen here...or anywhere we ship this poison.</p>	<p>Thank you for your comment.</p>
Ch05-015	Ruth Holder, Phillip Holder	<p>DEIS § 2.8 provides that the mixed xylenes project would also use “other materials and feedstocks” already used at the refinery. Yet, the study area for freshwater resources, DEIS §5.2.1, omits from consideration impacts on fish resources, including endangered salmon species, in the Skagit River as a result of accidents (e.g., derailments involving spills and explosions) involving the transportation by rail of oil or other feedstock materials to the</p>	<p>The proposed project and refinery boundary is located outside of the Skagit River watershed. In addition, the proposed project would not increase transport of materials by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the transport of materials by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. The</p>

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		<p>refinery. The FEIS must also include analysis of impacts on fish resources in the Skagit River resulting from accidents involving the rail transportation of “other materials and feedstocks” to the refinery.</p>	<p>major feedstock material (reformate) for xylene production would be brought to the refinery via marine vessel. Spills of xylenes and reformate in the marine environment were analyzed in Chapter 13 of the Draft EIS. Potential impacts to freshwater resources from the proposed project are discussed in Chapter 5 of the Draft EIS. Potential impacts on marine resources, including fish, are discussed in Chapter 7 of the Draft EIS.</p> <p>Sulfolane, aqueous ammonia, and perchloroethylene would be delivered by truck. Potential impacts from increased truck traffic to deliver these chemicals are discussed in Section 9.4.2.2 of the Draft EIS. Based on expected usage rates and typical truck capacity, the proposed project would generate approximately 50 truck trips per year. Impacts associated with an accidental spill of materials transported via truck, such as a spill along the I-5 bridge over the Skagit River, are discussed in Section 9.6 of the Draft EIS.</p>
Ch05-016	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Impacts to Water Quality</p> <p>The DEIS Definitions of “Significant Impacts” to Groundwater, Surface Water and Wetlands are Inconsistent with SEPA. Significance Does Not Require Permanence</p> <p>The definitions of “significant impacts” to surface water and groundwater in the DEIS require either degradation violative of Washington’s Water Quality Standards to the point that water quality is “unlikely to be reversed over several seasons or years without intervention,” or permanent alteration, change, degradation or loss. [DEIS 59] Likewise, “significant impacts” to wetlands are defined as “permanent loss of a jurisdictional wetland, particularly a high quality wetland, which would impact wetland functions at a watershed scale,” or “measurable changes to wetland hydrology impacting wetland functions at a watershed scale that would not be reversed within several growing seasons without intervention.” Id .</p> <p>“Permanent” damage is an extremely high threshold for a finding of significance. Permanent impacts are not required for a finding of significance per SEPA. WAC 19711794 defines significant as:</p> <p>(1) "Significant" as used in SEPA means a reasonable likelihood of</p>	<p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of the potential impacts, as well as the significance criteria provided in Chapter 5. Each potential impact was carefully analyzed according to the resource-specific criteria provided in Appendix 1-B of the Draft EIS and the supporting analysis of impacts in each of the resource chapters. The analysis also provides an explanation for why an impact was rated as <i>potentially significant</i> or <i>less than significant</i>. Criteria provided in Chapter 5 and Appendix 1-B allow for both permanent and less-than-permanent impacts to be significant. The criteria describe qualities necessary for permanent and non-permanent impacts to be significant. Consequently, the potential for permanence was not required for identifying a significant impact with respect to water quality. In addition, potential for significant cumulative impacts were also analyzed in the Draft EIS. The cumulative impact analysis accounted impacts from past, present, and reasonably foreseeable future actions that, in combination with the proposed project, could potentially result in cumulative impacts (including activities that could be characterized as impacts when</p>

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		<p>more than a moderate adverse impact on environmental quality. (2) Significance involves context and intensity (WAC 19711330) and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred. (3) WAC 19711330 specifies a process, including criteria and procedures, for determining whether a proposal is likely to have a significant adverse environmental impact.</p> <p>WAC 19711330 further elaborates some of the nuances of “significance” under SEPA:</p> <p>(3)(a) The same proposal may have a significant adverse impact in one location but not in another location; (b) The absolute quantitative effects of a proposal are also important, and may result in a significant adverse impact regardless of the nature of the existing environment; (c) Several marginal impacts when considered together may result in a significant adverse impact; (d) For some proposals, it may be impossible to forecast the environmental impacts with precision, often because some variables cannot be predicted or values cannot be quantified. (e) A proposal may to a significant degree:</p> <p>(i) Adversely affect environmentally sensitive or special areas, such as loss or destruction of historic, scientific, and cultural resources, parks, prime farmlands, wetlands, wild and scenic rivers, or wilderness;</p> <p>(ii) Adversely affect endangered or threatened species or their habitat;</p> <p>(iii) Conflict with local, state, or federal laws or requirements for the protection of the environment; and</p> <p>(iv) Establish a precedent for future actions with significant effects, involves unique and unknown risks to the environment, or may affect public health or safety.</p>	<p>considered together may result in a significant adverse impact).</p> <p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. Discharges from the refinery to the surrounding waters must be monitored and must adhere to chronic and aquatic life criteria defined by Ecology. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>According to Tesoro, the existing SWS, OWS, and WWTP have adequate storage capacity to meet the increased runoff. In advance of construction, Ecology would determine if the proposed project’s impact on the existing wastewater treatment plant would exceed design limits. All new waste streams must be evaluated to determine if the new loading plus existing waste streams would exceed 85 percent of the wastewater treatment system design capacity. An engineering report is required by Ecology 6 months prior to the start of construction.</p> <p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery’s wastewater treatment plant.</p> <p>In addition to the information in Section 5.3.2 of the Draft EIS, the description of the New Tanks Area in Section 2.6.5 of the Draft</p>

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		<p>Skagit County should consider the above statutory definitions when making a determination of significance rather than relying on Tesoro’s definitions or requiring permanent damage or degradation to reach a determination of significance. Applying SEPA’s definition of significance may result in findings of significant impacts downplayed by Tesoro due to the higher standard it used.</p> <p>The Xylenes Project Will Result in a Significant Increase in Stormwater Runoff From Areas Where Stormwater Infrastructure is Removed</p> <p>The Tesoro Xylenes project will result in a significant increase in stormwater runoff from the New Project Area and other construction areas for the purpose of Xylenes processing and storage. The DEIS indicates that “14.66 acres of new impervious surfaces within the New Tanks Area, would represent a new source of stormwater that would be routed to the WWTP,”[DEIS 531] but the current capacity of the WWTP is not discussed. Approximately 18 acres of new impervious surface would be created in total as a result of the proposed project, which will contribute additional stormwater flows. [DEIS 513,Figure 52] “Surface runoff from the approximately 4.7 acres of disturbance within the developed portion of the refinery would drain to the existing OWS and SWS,” which are also routed to the WWTP. [DEIS 512]</p> <p>According to annual precipitation data from NOAA, one inch of rain or snow melt produces 27,150 gallons of stormwater runoff per 1 acre of pavement. [Environment Education Guide: Protecting Washington’s Waters from Stormwater Pollution. Ecology Publication #0710058. Available online at: https://fortress.wa.gov/ecy/publications/documents/0710058.pdf] According to U.S. Climate Data.com, Anacortes averages 27.85 inches of rainfall per year.</p> <p>[http://www.usclimatedata.com/climate/anacortes/washington/unitedstates/uswa0011 . Last visited May 1 st , 2017.] Using the formula used by NOAA and Washington’s Department of Ecology, in Anacortes, approximately 756,127 gallons of stormwater will be</p>	<p>EIS states that nearly all the impervious surface created for the New Tanks Area would generate stormwater. The majority of the stormwater would fall within the tank farm diked areas and then be routed to the refinery’s WWTP. Section 2.7.1 of the Draft EIS includes a reference to the preliminary construction drawings illustrating the location and design of the proposed new tanks area, including the stormwater system (see Appendix 2-D Geotechnical Drawings, Tankage Site Plan).</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Information regarding agencies responsible for stormwater is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding planned prevention and minimization measures, including drainage ditches, is provided in Table 8 in Chapter 4 of this Final EIS.</p>

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		<p>produced annually per paved acre – this means that the project may produce at least 13,610,286 additional gallons of stormwater yearly on the 18 acres of new impervious surface that Tesoro plans to construct at its March Point facility.</p> <p>The DEIS does not discuss stormwater quantities. The DEIS merely states that “[t]he existing SWS, OWS, and WWTP have adequate storage capacity to meet the increased runoff.” [DEIS 521] Additional stormwater flows resulting from the project which may exceed 13 million gallons per year must be considered in the DEIS. What is the current daily and annual capacity of the stormwater and oily water systems? What is the storage capacity? What is the daily and annual capacity of the wastewater treatment plant? If the new stormwater flows exceed the facilities capacity, the OWS, SWS, and/or WWTP may need to be modified to accommodate additional flows as part of the project.</p> <p>In addition to these capacity considerations, the DEIS does not address the removal of existing stormwater infrastructure in the area that will see the greatest increase of impervious surface – the New Tanks Area. There are four manmade stormwater drainage ditches in the New Tanks Area that are presently used as stormwater infrastructure to divert runoff. If the Xylenes Project is approved, two of these ditches will be completely removed/filled in (ditches 2 and 3), and the other two will be almost completely filled in (ditches 4 and 5). How will construction of the New Tanks Area and removal of these ditches impact the ability of the stormwater system to function?</p> <p>Elimination of 1502 feet out of 1730 feet of drainage infrastructure in the New Tanks Area is a significant reduction whilst adding 14.66 acres of impermeable surface to that area which will produce millions of gallons of additional stormwater runoff annually. What is the expected capacity of the stormwater system after these ditches are removed, and how will Tesoro ensure that flows do not exceed capacity after ditch removal?</p> <p>Per the DEIS, “[a]fter construction of the New Tanks Area, runoff that currently terminates in the upland area west of the New Tanks Area would instead be directed into the facility’s SWS</p>	

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		<p>system and discharged according to the Tesoro NPDES Industrial Wastewater Discharge Permit.”[DEIS 519] Will additional ditches or other infrastructure be constructed to ensure that runoff flows to the stormwater system? If so, where? What are the dimensions of this infrastructure? How will it be constructed? There are no sketches, layouts, or diagrams with this information in the DEIS. Any additional stormwater infrastructure should be included in the DEIS and should be placed strategically to avoid stormwater running off into the many wetlands dotting the area, from sheeting off into Fidalgo Bay , or from infiltrating groundwater.</p>	
Ch05-017	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Sulfolane is the one chemical treated differently in the DEIS. “Sulfolane management practices and procedures, including recycling and treatment methodologies, would be developed prior to startup operations as a component of the refinery’s Process Safety Management Program. Planned control measures include: a closed sewer system to collect stormwater in the area around the sulfolane tank that would be isolated and quality verified to check sulfolane concentration prior to releasing to the OWS system,” and “Secondary containment around the sulfolane storage tank and pumps that transfer sulfolane to the ARU process.” [DEIS 523] After use, “sulfolane would not be routed to the WWTP as it is not compatible with the WWTP system; separate measures are in place for sulfolane.”[DEIS 523] How will stormwater be handled if contaminated by sulfolane? How will sulfolane be disposed of? If sulfolane or byproducts of sulfolane will be discharged in a wastewater stream produced at the facility, how will these discharges be filtered and treated, and by what system the WWTP? A new NPDES permit will be required to account for discharges of sulfolane or its byproducts after treatment. The DEIS is notably silent on these important topics; the FEIS should not be.</p> <p>Sulfolane is a contaminant of concern in Canada. [Fikr, Lukas, “What is Sulfolane and Why is it Now a Contaminant of Concern”? June 24, 2016. Blog on Ridgeline Canada, Inc. Available online at http://www.ridgelinecanada.com/sulfolanenowcontaminantconcern/ . Last accessed May 2 nd , 2017.] In the U.S., sulfolane is an emerging contaminant, and the possible effects of longterm exposure to this chemical through drinking water are not yet fully</p>	<p>The different spill prevention measures for the various materials that would be used as part of the proposed project are detailed in Chapter 2 of the Draft EIS. Sulfolane spill prevention measures and behavior of sulfolane if spilled are discussed in Section 2.8.3.1 and 5.3.2.3 of the Draft EIS. Changes to the existing NPDES permit and the capacity of the existing WWTP are discussed in Section 5.3.2.2 of the Draft EIS. See Section 9.6.2.1 of the Draft EIS for further information on the toxicity of sulfolane.</p> <p>The ARU would be equipped with a sulfolane-specific OWS system designed to minimize the chance of sulfolane entering the refinery OWS. This special sewer system serves as an upstream wastewater pollution prevention technique consistent with Ecology’s NPDES Wastewater Discharge Permit Pollution Prevention goals. The following engineering controls would be included to manage sulfolane at the refinery:</p> <ul style="list-style-type: none"> • Closed drain system and sump to collect and recycle the sulfolane to the process • Closed sewer system to collect stormwater that would be isolated and quality verified to check sulfolane concentration prior to releasing to the OWS system • Secondary containment around the sulfolane storage tank and pumps that transfer sulfolane to the ARU process • Sulfolane management practices and procedures, including recycling and treatment methodologies, would be developed prior to start-up operations as a component of the refinery’s process safety management program

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		<p>understood, although there are known sites where groundwater has been contaminated by sulfolane as a result of oil refinery operations, including the North Pole Refinery in Alaska. [Alaska Division of Spill Prevention and Response, Contaminated Sites Program, North Pole Refinery Project Home, last updated March 22, 2017. http://dec.alaska.gov/spar/csp/sites/northpolerefinery/ Last Accessed May 3 rd , 2017.] At this site, Flint Hills must now provide drinking water to 1,500 residents whose drinking water was contaminated by their use of sulfolane for oil operations. Id. The contamination was identified in 2009, yet as of June 22 nd , 2016 – 7 years later cleanup levels had not even been set. [Alaska Division of Spill Prevention and Response, Contaminated Sites Program, Private Water Systems, last updated June 22 nd , 2016. Available online at http://dec.alaska.gov/spar/csp/sites/northpolerefinery/water.htm#aws . Last Accessed May 3 rd , 2017.] The unknown toxicity and risks of this chemical caution that special consideration should be given regarding how it is used and handled, and whether appropriate safety and spill prevention measures are in place to minimize such risks. This was not done in the DEIS; we ask that these details be included in the FEIS.</p>	<p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project, including the use of sulfolane, in accordance with state and federal requirements. Information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch05-018	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for</p>	<p>NPDES Permit 0000761 [Ex 2B] does not cover the proposed project</p> <p>Tesoro operates under an industrial wastewater permit, 0000761, for a petroleum refinery with no mention of Xylenes Processing. Tesoro has an oily water system [OWS] and stormwater system [SWS] that route to the onsite wastewater treatment plant [WWTP] before being discharged along with process wastewater through an outfall, Outfall 1, into Fidalgo Bay. In addition to stormwater and oily water from the SWS and OWS on site, Tesoro currently receives untreated wastewater from Tesoro Logistics Operations, a sister company also operating in the area, which it treats at its WWTP. Currently, “[i]ndustrial wastewater (including process wastewater and contaminated stormwater) receives primary and secondary treatment in a wastewater treatment system consisting of 2 parallel API oil/water separators, 2 primary clarifiers, 2 activated sludge units, 2 secondary clarifiers, and 2</p>	<p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. Discharges from the refinery to the surrounding waters must be monitored and must adhere to chronic and aquatic life criteria defined by Ecology. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements. The description of the New Tanks Area in</p>

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	<p>Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>final holding ponds.” [Fact Sheet for NPDES Permit WA 0000761, Tesoro Refining & Marketing, May 2013. (Hereinafter “Fact Sheet”) p. 8]</p> <p>Tesoro indicates that its wastewater permit would be modified in Chapter 5, however, a new permit should be required. Per WAC 173220150 (1)(b): “Any facility expansions, production increases or process modifications which would result in new or increased discharges of pollutants causing effluent limitations in the permit to be exceeded must be reported to the department by submission of a new application or supplement thereto.” Design standards for the permit state that the plant shall not exceed 4.3 million gallons of wastewater a day (average monthly). [Fact Sheet p. 14] How much more wastewater will be produced once Tesoro increases its capacity and starts processing Xylenes? The additional flows from Tesoro Logistics Operations, and additional stormwater flows, should also be quantified and included in any calculation regarding wastewater treatment capacity and limitations under the permit.</p> <p>[Supplemental Fact Sheet for NPDES Permit WA 0000761, Tesoro Refining & Marketing, October 17 th , 2014. (Hereinafter “Supplemental Fact Sheet”) p. 2.]</p> <p>In light of the above, Tesoro must submit a new application for an NPDES permit to include Xylenes processing, account for increased wastewater flows (including stormwater), and to account for the proper treatment and disposal of new chemicals used at the facility. The new permit should meet current water quality standards and regulations.</p> <p>Potential impacts to Fidalgo Bay and Groundwater From Construction</p> <p>Per the DEIS, during construction, “approximately 23.4 acres of land that would be disturbed does not currently drain to the OWS and SWS. This includes land in the New Tank Area, Potential Temporary Laydown Area, and land near the North Texas Road Refinements. Stormwater from these areas would drain through sheet flow toward Fidalgo Bay and would also infiltrate to groundwater. Stormwater at the New Tank Area and Temporary</p>	<p>Section 2.6.5 and 5.3.2 of the Draft EIS states that nearly all the impervious surface created for the New Tanks Area would generate stormwater. The majority of the stormwater would fall within the tank farm diked areas and then be routed to the refinery’s WWTP. In addition, spills within the New Tanks Area, including from reformate or xylenes tanks leaks, would be captured in the OWS system and routed to the WWTP. Section 2.7.1 of the Draft EIS includes a reference to the preliminary construction drawings illustrating the location and design of the proposed new tanks area, including the SWS and OWS systems (see Appendix 2-D Geotechnical Drawings, Tankage Site Plan).</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>According to Tesoro, the existing SWS, OWS, and WWTP have adequate storage capacity to meet the increased runoff. In advance of construction, Ecology would determine if the proposed project’s impact on the existing wastewater treatment plant would exceed design limits. All new waste streams must be evaluated to determine if the new loading plus existing waste streams would exceed 85 percent of the wastewater treatment system design capacity. An engineering report is required by Ecology 6 months prior to the start of construction.</p> <p>The commenter is correct that Tesoro would need to apply for coverage under a new Construction Stormwater General Permit managed by Ecology. Appendix 2-B is the NPDES Wastewater Discharge Permit, which does not contain BMPs associated with construction of the proposed project. As stated in Section 5.3.2.1</p>

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		<p>Laydown Areas would also drain to detention ditches, where it would infiltrate to groundwater and evaporate.” [DEIS 514] This is unacceptable.</p> <p>Impacts to groundwater, waterbodies including Fidalgo Bay, and other local water resources should be minimized. Tesoro mentions preparation of a SWPPP and a Temporary Erosion Sediment Control plan (TESC) – these should be included with the DEIS if they include measures that will mitigate or offset impacts to Fidalgo Bay and/or groundwater from construction (which they should). Tesoro states that more details about the Best Management Practices that it will use during construction can be found in its proposed NPDES Construction Stormwater Permit, attached as Exhibit 2B to the DEIS. However, Exhibit 2B is Tesoro’s preexisting Industrial Stormwater Pollution Permit. Tesoro will need to apply for coverage under the newly issued Construction Stormwater General Permit.</p> <p>Tesoro proposes to install new ditches to capture stormwater from the above described areas and route it to the Stormwater System. The new ditches are not diagramed, nor is their location or size described, in the DEIS. This information needs to be included. How many feet long will the new ditches be? How much stormwater will they be able to contain before overflowing or flooding? And will they be placed in such a manner that construction stormwater will not flow directly down into adjacent wetlands or into Fidalgo Bay? Furthermore, such infrastructure must be in place prior to groundbreaking. The DEIS analysis is incomplete without these details which must be included in the FEIS.</p> <p>Impacts to Wetlands Including Complete Removal</p> <p>There are two small isolated wetlands (W47 and W48), as well as the four drainage ditches previously described, in the New Tanks Area that will be filled in or removed should the Xylenes Project move forward. The USACE has determined that these wetlands and ditches are not waters of the United States under the Clean Water Act Section 404 jurisdiction. [DEIS 2-19 and 534] Regardless of their 404 status, these wetlands will be permanently impacted – completely removed – and thus this significant impact (total loss of</p>	<p>of the Draft EIS, a construction SWPPP would be prepared that would identify applicable BMPs in accordance with the Stormwater Management Manual for Western Washington. Stormwater during construction would be managed in accordance with the construction SWPPP under the regulatory authority of Ecology. Stormwater runoff during construction would be managed to prevent impacts to waters of the state. Information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed project would be located in an area identified by Skagit County with potential or existing seawater intrusion (see Section 5.4.2 of the Draft EIS). Potential impacts to groundwater from dewatering during construction are discussed in Section 5.4.2.1 of the Draft EIS.</p> <p>Additional information regarding planned prevention and minimization measures, including drainage ditches and erosion protection, is provided in Table 8 in Chapter 4 of this Final EIS.</p> <p>While it is true that there would be some loss of non-jurisdictional wetlands, these wetlands are of low quality and are not hydrologically connected to the other wetlands and are not connected to Fidalgo Bay. As described in Section 5.3 of the Draft EIS, BMPs in accordance with the Stormwater Management Manual for Western Washington would be in place during construction to prevent the release of sediment into surface waters, including surface waters within wetlands. As stated above, stormwater during construction would be managed in accordance with the construction SWPPP under the regulatory authority of Ecology.</p> <p>According to Section 5.4.1 in the Draft EIS, the shallow groundwater is perched groundwater, which may be encountered at various depths and locations throughout the site during the excavation process. Perched groundwater is isolated from other water sources; therefore, impacts resulting from dewatering of perched groundwater are likely to be restricted to the immediate location of dewatering. The highest groundwater elevations from borings completed in the New Tanks Area were</p>

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		<p>two wetlands) should be considered. There are 11 or more wetlands located around the project area. Some of the other wetlands adjacent to the New Tanks Area are hydrologically connected and connected to Fidalgo Bay. [DEIS 536]</p> <p>Because of the sensitivity and special status of Fidalgo Bay, appropriate consideration and planning should be taken to ensure that no disturbance to wetlands occurs in the New Tanks Area, or other project areas, that may result in contaminated water entering Fidalgo Bay. According to Tesoro, protections would be implemented including construction stormwater best management practices during construction. Wetlands would be marked with “highly visible fencing” during construction to prevent disturbance. How will the fencing prevent soil erosion, stormwater runoff, or chemical contamination to the wetlands, groundwater and/or Fidalgo Bay in the event of a heavy rain event or a chemical spill? The FEIS should completely respond to these questions in order to protect Fidalgo Bay.</p> <p>The Potential for Groundwater Impacts is Significant</p> <p>High water tables, the potential for saltwater intrusion, and the grading and excavation proposed in the New Tanks Area all raise concerns.</p> <p>The “immediate spill response” promised by Tesoro may be difficult if not impossible if the reformate or xylenes tanks leak or spill in the New Tanks Area. “Groundwater depths within the study area vary from a minimum of 3 feet below ground surface (bgs) in the New Tanks area and up to 30 feet bgs in the ARU area” [DEIS 526] There are also five wells in the new project area. [DEIS 527] The potential risk to groundwater and potential drinking water resources seems significant, particularly where “[p]ermanent subsurface structures, such as the pad for the product tanks in the New Tank Area and concrete augercast piles, could come into contact with groundwater, permanently modifying subsurface conditions.” [DEIS 530] This type of permanent modification could significantly impact the environment in the New Tanks Area. The FEIS should either determine that the impact is significant or provide further information justifying the decisions not to consider</p>	<p>approximately 3 to 8 feet below the proposed tank pad elevation. Similar to the stormwater discussion above, groundwater would be managed during construction in accordance with the construction SWPPP and TESC Plan to prevent an exceedance of groundwater quality standards.</p> <p>The proposed project area is not underlain by a drinking water aquifer. However, according to the County’s Category 1 Aquifer Recharge Areas map (Skagit County 2010), the proposed project is located within an area identified by the County as potential for existing seawater intrusion areas. In these areas, projects with a groundwater withdrawal are assessed for potential impacts on groundwater from seawater intrusion. Prohibited activities in these areas involve those that would significantly degrade groundwater quality, reduce the recharge to aquifers currently or potentially used as a potable water source, or that may serve as a significant source of base flow to a flow-sensitive basin stream. As described above, the shallow groundwater is perched groundwater, which may be encountered at various depths during construction. Perched groundwater is isolated from other water sources, including potential saltwater intrusion and underlying aquifers, and potential impacts would be temporary and would be limited in extent to the area immediately surrounding construction.</p>

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		<p>this impact significant.</p> <p>Per the DEIS, groundwater depth may also necessitate dewatering during construction, which could result in a lowered water table. [DEIS 529] The project area was also identified as having existing or potential saltwater intrusion. [DEIS 525] How will the potential for saltwater intrusion be minimized, when the New Tanks Area is going to be graded and excavated and leveled? What is the risk of saltwater or water degrading or damaging the xylenes and reformate tanks in installed below the water table? How is the groundwater depth being addressed in the DEIS? If dewatering of groundwater is necessary and causes lowering of the water table and/or saltwater intrusion, how are these impacts quantified?</p> <p>“Prohibited activities in areas [where there is existing or potential for salt water intrusion to groundwater] involve those that would significantly degrade groundwater quality; reduce the recharge to aquifers currently or potentially used as a potable water source; or that may serve as a significant source of base flow to a flowsensitive basin stream.” [DEIS 525] The new construction required by the Xylenes Project will take place on areas where groundwater was found as low as 3 feet below ground level. If dewatering must take place, Tesoro indicates this will lower the water table – will this “reduce the recharge to aquifers”? Will Tesoro’s construction activities degrade groundwater quality? If so, construction of the New Tanks Area is prohibited.</p>	
Ch05-019	Evergreen Islands	<ul style="list-style-type: none"> • What are the potential impacts on bays, rivers, streams, ground water, and aquifers near the project site from limited or catastrophic oil spills? • What are the potential impacts on bays, rivers, streams, and aquifers located along major rail routes from limited or catastrophic petroleum (crude oil, xylene, etc.) spills? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Ch05-020	Joanna Schoettler	We need to protect our waters. Water is sacred. Fossil fuels poison and are killing us. We can live without fossil fuels, We can't live without clean water!	Thank you for your comment.

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Ch05-021	Xochi Flores Rose	<p>I am concerned about contamination of nearby groundwater. Maps of the area show the new tanks area will be surrounded by a berm to prevent spills. The new tanks area drains west toward Fidalgo Bay. The new tanks area is where Wetlands W47 and W48 are located. W47 and W48 are man-made ditches, and as such they are not regulated as waters of the State by the Department of Ecology, nor did the Army Corps of Engineers take jurisdiction over these two isolated wetlands. How will Tesoro prevent spills from leaching underneath the tanks area containment berms and joining runoff in these unregulated man-made ditches (wetlands) which drain into Fidalgo Bay?</p>	<p>The proposed xylene storage systems and pumping areas were designed to include secondary containment around all tanks so that any xylene that leaked would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's WWTP (see Section 2.8.5 of the Draft EIS). Leak detection systems for tanks and piping would alert workers in the event of a spill and there are spill measures in place to quickly clean up any spills. Refinery personnel are trained in spill prevention and response. If the secondary containment failed, the spilled material would be routed to the WWTP.</p> <p>Spill prevention and response measures are further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Potential impacts on geological resources (including soil erosion) – Section 3.3.2 • Potential impacts to groundwater – Section 5.4.2.3 • Freshwater resources (including surface water and wetlands) – Sections 5.3.2.3 and 5.5.2.3 <p>Additional information regarding agencies responsible for regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch05-022	Maureen Scheetz	<p>All the Communities; human, wildlife, air and vegetation surrounding March's Point will be impacted by this industrial product. The air quality, surface water and wetlands will be degraded and possibly destroyed.</p>	<p>Thank you for your comment.</p>
Ch05-023	Anne Greene	<p>The DEIS does not include a thorough review of the safety requirements and full impacts of the project, such as:</p> <p>...</p>	<p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within</p>

ID	Contact	Comment Text	Response
		<p>- the significant increase in stormwater runoff containing new toxic chemicals such as xylene ;</p>	<p>the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery’s wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch05-024	Maradel Gale	Require a new NPDES permit in light of the significant increase in stormwater and wastewater flows and use of new toxic chemicals;	Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with

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			<p>secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery's wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery's WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch05-025	Barry LeBeau	Require a new NPDES permit in light of the significant increase in stormwater and new toxic chemicals; & as a Priority Hazardous	Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to

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		Substance-#180;	<p>waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery's wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p>

Chapter 6: Terrestrial Vegetation and Wildlife

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Ch06-001	Gary McCabe	The area the plant is in is already at extreme risk of worst-case spills and toxic releases to wildlife, sediments, birds, fish, mammals, on and on....	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The proposed project is designed with secondary containment systems to contain spills at the refinery and spill detection devices to alert workers in the event of a spill. The system was designed such that spills within the developed portions of the refinery would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery’s wastewater treatment plant. If the containment failed or a spill occurred outside of containment, response measures would be implemented to control the spill. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety

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			<p>management, preventive measures and inspections, and oil spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>If a spill were to occur, the potential impacts referenced are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine and nearshore resources (including sediments) – Section 7.4.3 • Marine spills and spill response – Section 13.5
Ch06-002	Dori Bailey	This is have a huge impact on the wildlife.	<p>Potential impacts to wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife and marine birds – Chapter 6 • Marine wildlife – Chapter 7 <p>Additional information regarding potential impacts to wildlife is provided in Sections 3.4 and 3.5 of this Final EIS.</p>
Ch06-003	Anne Cox	Terrestrial vegetation and wildlife are also listed as not significant issues, which again presumes all will be well. Xylenes and reformate are not without real dangers to vegetation and wildlife. I believe that optimism is nice, but not good enough.	<p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B of the Draft EIS and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant.</p>
Ch06-004	Nancy Hansen	What types of testing has been done on toxic air, soil, and water at and near the refinery? This should be a requirement, at least to establish a baseline.	<p>Baseline conditions (referred to as the “affected environment” in the Draft EIS) and potential impacts to air, soil, and water as a result of the proposed project are discussed in the following</p>

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		<p>it was observed from the beach on the east side of the refinery that not a single live aquatic species that would ordinarily be present on a Puget Sound beach was observed - no mussels, crabs, seaweed, or barnacles.</p>	<p>chapters of the Draft EIS:</p> <ul style="list-style-type: none"> • Geological resources, including soils – Chapter 3 • Air quality and climate change – Chapter 4 • Freshwater resources (including surface water, groundwater, and wetlands) – Chapter 5 • Terrestrial vegetation and wildlife – Chapter 6 • Marine waters and resources – Chapter 7 <p>The comment pertaining to the lack of aquatic species present to the east of refinery is noted. However, crabs are present on the referenced beach and a current survey would be needed to confirm whether suitable habitat for the other species is present and, if so, whether any of these species are present.</p> <p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively

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			<ul style="list-style-type: none"> • Marine and nearshore resources – Section 7.4 <p>Additional information regarding agencies responsible for regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Existing refinery emissions provided in Table 4-9 of the Draft EIS are included in the ambient background concentrations for the region as used in the analysis of air quality impacts. Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards. See Section 4.4.2.1 of the Draft EIS. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding proposed project emissions and potential mitigation has been further analyzed in Section 3.3 of this Final EIS.</p>
Ch06-005	Constance Snell	Maybe, we should consider who will benefit if the xylene facility is denied. ... Wildlife in general will benefit from less exposure to the hazards of petro chemicals. Our already imperiled orcas and herons will benefit.	Thank you for your comment.
Ch06-006	Bob Hall	Populations of specific species of birds that winter in these bays needs to be analyzed. A sizeable number of the total population of some winter here.	Migratory birds that overwinter in Padilla Bay and Fidalgo Bay and marine birds are discussed in Section 6.3.2.2 of the Draft EIS. Potential impacts to marine birds are discussed in Section 6.4. Additional information regarding marine birds is provided in Section 3.4 of this Final EIS.
Ch06-007	Matthew Anderson	We should consider who will benefit if the xylene facility is denied...Wildlife in general will benefit from less exposure to the hazards of petro chemicals. Our already imperiled orcas and herons will benefit.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch06-008	Will Golding	<p>What impacts will this project have on ecosystem services from the local natural environment?</p>	<p>An analysis of ecosystem services is not currently required under SEPA and no significant impacts were identified where there would be a potential loss of ecosystem services that could be quantified beyond a speculative basis. Therefore, an ecosystem service analysis was not completed as part of this EIS. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)).</p> <p>Potential impacts of the proposed project on ecosystems and the local natural environment are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and greenhouse gas – Section 4.4 • Terrestrial wildlife and marine birds – Section 6.4 • Marine wildlife – Section 7.4 • Human health – Section 9.6 • Land and shoreline use – Section 10.3 • Recreation – Section 10.4 • Aesthetic and visual resources – Section 10.5 • Public services – Section 11.4 • Economic condition – Section 11.5 • Tribal fisheries and aquaculture – Section 11.5 • Cultural resources – Section 12.4 • Vessel traffic – Section 13.3.2
Ch06-009	Skagit Audubon Society, Timothy Manns	<p>3. The analysis of potential impacts to birds and other species if a spill of reformat or mixed xylenes should occur in Padilla or Fidalgo Bays is inadequate, and the conclusion of less significant impact is not justified.</p> <p>The following conclusion is stated on page 6-32: “In summary, all potential impacts on terrestrial vegetation and wildlife were evaluated as less than significant.” (We note that waterfowl and seabirds are included in the draft EIS section on terrestrial wildlife.) This conclusion does not appear to be justified by the analysis in the draft EIS. The draft reassuringly states, for example, that the non-viscous quality of reformat and xylenes, in contrast with crude oil, would limit their effects should they come in contact with birds. However, the duration of toxic effects could extend</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential impacts and significance of a spill described in Section 13.5 of the Draft EIS were derived from an uncontrolled spill scenario (i.e., without the mitigating effect of rapid and effective response) of mixed xylenes or reformat into the marine environment. The subsequent analysis of impacts from a marine spill in each of the resource chapters were, therefore, derived from an uncontrolled spill scenario (i.e., no spill response) and were conservatively high.</p>

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		<p>over several days. As correctly noted in Chapter 6 of the draft EIS, in winter there can be large accumulations of waterfowl on Fidalgo and Padilla Bays. In summer, at low tide, many Great Blue Herons forage in the extensive shallow waters. At page ES-26, we read, “For the modeled maximum most probable spill scenario, the thickness of spilled material was estimated to decrease below the levels of concern within 36 hours. For the average most probable spill scenario, 99.5 percent of the spilled material was estimated to evaporate or dissipate within 12 hours.” (See also p.6-31: “In the modeled spill scenarios, xylene and reformate volatilized to levels below those associated with marine bird toxicity within 2 days, and 99.5 percent of spilled material would evaporate or dissipate within 3 days.”) The sheen of spilled chemicals would expand widely and affect many birds over a period of several days while the spilled chemicals are in the process of volatilizing. What would be the effects, for example, on the ESA-listed Marbled Murrelet during exposure to xylenes or reformate over a period of hours to several days?</p> <p>Under anything but perfectly still air, it would seem that evaporated xylenes and reformate would be carried to birds on the water, in flight, or in adjacent upland areas, such as the March Point heronry, well within a 12 to 36-hour period. How does Tesoro propose to mitigate this potential impact? Simply dismissing it as improbable and therefore not significant is clearly not adequate.</p> <p>At the April 17, 2017, public meeting on the draft EIS, one speaker pointed out that the modeled scenarios omit emergency response which he believes would effectively limit a spill’s adverse effects. The draft EIS, however, points out that xylenes are colorless and odorless and can only be detected with instruments. The spread of crude oil is very difficult to control, particularly when a sheen forms and the water is other than calm. Would control for some reason be easier with xylenes and reformate? How effective (and dangerous for responders) can containment measures really be expected to be when an invisible, toxic sheen of xylenes or reformate propagates from the spill location? Appendix 13-A, p.58 mentions case studies of xylene spills elsewhere: “The Louisiana</p>	<p>Potential impacts to terrestrial vegetation and wildlife, including marine birds and special status species, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction impacts – Section 6.4.1 • Operation impacts – Section 6.4.2 • Spills to land – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 • Special status species – Section 6.5 <p>See Section 3.4 of this Final EIS for further information concerning terrestrial vegetation and wildlife, including marine bird resources. See Section 3.5 of this Final EIS for further information concerning marine and nearshore resources and Section 3.5.2 regarding toxicity of xylene to marine birds and aquatic life. Section 3.9 of this Final EIS discusses additional information regarding marine spills.</p> <p>Additional information regarding agencies responsible for listed species, marine and nearshore resources, terrestrial vegetation and wildlife, marine birds, and marine vessel traffic is provided in Table 2 in Section 3.1 of this Final EIS.</p>

ID	Contact	Comment Text	Response
		<p>Department of Environmental Quality reported that nobody was seriously hurt during the 2007 T/V BOW LION xylene spill on the Mississippi River (1,000 bbls) and responders described the spill as hard to contain and locate on the water due to its evaporation rate. Tests showed that the xylene had evaporated within 2 days.”</p> <p>We believe it is, therefore, realistic to evaluate the potential effects of a spill without the mitigating effect of rapid and effective response. It then remains to follow through and truly consider the implications for wildlife and people of xylene and reformate presence in the air and on the water and/or ground for up to several days. The draft EIS does not do this not does it propose mitigation.</p> <p>The final EIS must correct this significant deficiency.</p>	
Ch06-010	Skagit Audubon Society, Timothy Manns	<p>Page 6-29 addresses “Xylene and Reformate Toxicity to Terrestrial Wildlife,” which in the draft EIS includes bird species primarily or solely in the marine environment:</p> <p>“However, the less viscous layer of xylenes and reformate products on the water surface still does have the potential for some direct toxicity related to feather coating more commonly associated with heavy oil spills, such as lost thermo-regulation and consumption of aromatics during preening, as well as indirect mortality due to compromised flight and foraging ability. Surface dwelling organisms such as seabirds may also inhale toxic doses of petroleum vapor when at the surface in the vicinity of an oil spill (Geraci 1990, Geraci and Williams 1990, as referenced in NRC 2003). However, there appears to be few data that prove inhalation of petroleum vapors, such as xylene and reformate, is a primary source of mortality from xylene or reformate exposure (NRC 2003) and impacts, if present, are generally limited to changes in the circulatory system and irritation or damage to lungs and mucous membranes (Boyd et al. 2001).”</p>	<p>Additional information regarding the analysis of potential impacts on marine birds resulting from a spill of xylene or reformate is provided in Section 3.5.2 of this Final EIS. No studies were identified that assessed the acute toxicity of inhalation or ingestion of xylene or reformate in birds. Therefore, impacts to marine birds in the event of a worst-case or maximum most probable spill scenario were conservatively estimated to be potentially significant for those birds in the study area (see Section 6.4.3.3 of the Draft EIS).</p> <p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS and in accordance with SEPA guidelines, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable</p>

ID	Contact	Comment Text	Response
		<p>An absence of data is taken as support for concluding there would be no significant toxic effect on birds. This conclusion has no more validity than the opposite; i.e., finding that because there can be toxic effects of unpredictable severity on birds the adverse impacts of a spill or other untoward event should be rated “significant”. In the face of a lack of directly relevant research, more cautious conclusions are warranted than those presented in the draft EIS.</p> <p>Page 6-31 states that, “The highest risks to wildlife would result from a spill in an area with high concentrations of prey, during the breeding season, during migration, or during the winter where many birds are concentrated.” ... “Based on the non-persistent nature of mixed xylenes and reformate, impacts on terrestrial wildlife (here defined to include marine birds) are expected to be short-term (less than 3 days). A spill is therefore unlikely to directly impact marine bird habitat for more than a few days.” ... “The impacts of a worst-case or maximum most probable spill could have a potentially significant impact on marine birds if: such a spill were to occur in an area with important foraging, resting, or staging habitat for marine birds, in particular flightless molting birds, during seasonally high concentrations; and response actions were not successful or failed in some way.” Given the admission at this point in the draft EIS that impacts on birds could be significant, why is no mitigation suggested? Why is the summary statement in Chapter 6 (page 6-32) that, “all potential impacts on terrestrial vegetation and wildlife were evaluated as less than significant.”? If no mitigation is possible, the project should not be permitted.</p> <p>The final EIS must correct the deficiencies identified here, including the contradictions, lack of sufficient relevant research, and unsupported conclusions.</p>	<p>adverse environmental impacts that are significant.</p> <p>The SEPA Rules define “significant” as something that has a <i>reasonable likelihood of more than a moderate adverse impact on environmental quality. Significance involves context and intensity and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred (WAC 197-11-794).</i></p>
Ch06-011	Ruth Holder, Phillip Holder	<p>B. Impacts on Fish and Wildlife</p> <p>We agree with the DEIS comment submitted for the Skagit Audubon Society by Tim Manns, Conservation Chair dated May 7, 2017 concerning probable significant adverse impacts to birds and the failure of the DEIS to adequately address these impacts. We hereby fully incorporate by reference the entirety of this comment. We are especially concerned that the DEIS states the</p>	<p>The Draft EIS discusses the potential impacts to terrestrial species, including marine birds, and marine and nearshore resources during construction and operation of the proposed project in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4 • Xylene toxicity to terrestrial wildlife – Section 6.4.3.3

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		<p>impacts of a spill of xylenes or reformat would result in no significant avian impacts when in fact little is known about the effect of xylenes and reformat on birds and their habitat. DEIS Appendix 13-A. The FEIS process must require and include additional studies before reaching any conclusion as to significance of impacts. Also, the DEIS fails to recommend mitigation for what it identifies as potentially significant adverse impacts to marine birds from a worst case or “maximum most probable spill” occurring “with important foraging, resting, or staging habitat for marine birds, in particular flightless molting birds, during seasonally high concentrations; and response actions were not successful or failed in some way.” DEIS p. 6-31, Impacts on Terrestrial Wildlife. This finding does not comport with the DEIS’s “less than significant” finding for impacts on terrestrial or marine wildlife. This and all other points and questions raised in Skagit Audubon’s comment must be clearly addressed in the FEIS and mitigations recommended for significant impacts.</p> <p>The DEIS “less than significant” finding concerning impacts of spills is especially inappropriate as it applies to Padilla Bay. Padilla Bay has distinctive status: under the Shoreline Management Act, Padilla Bay is a Shoreline of Statewide Significance (RCW 90.58.020). “The legislature declares that the interest of all of the people shall be paramount in the management of shorelines of statewide significance.” This provision in the statute is an expression of the Public Trust Doctrine, a legal doctrine which has a long tradition in Western democracy. It imposes upon permitting agencies an affirmative obligation as trustees to protect the Bay and all its resources (terrestrial, marine and plant) for the benefit of all, including for succeeding generations. Environmental standards based upon this Doctrine cannot be treated merely as a set of minimum or advisory requirements. The Public Trust Doctrine is a common law doctrine and cannot be obliquely repudiated by regulation or permit. Instead, the Doctrine must be applied broadly and rigorously to protect crucial public resources including, in this case, Padilla Bay and its fish, wildlife, and plant resources. The National Estuarine Research Reserve was created for preservation of the Bay and estuarine research and monitoring. Padilla Bay is also designated as a Globally Important Bird Area and</p>	<ul style="list-style-type: none"> • Marine and nearshore resources – Section 7.4 <p>The Draft EIS analyzed potential impacts on marine and nearshore resources and terrestrial vegetation and wildlife, including marine birds, in the event of a spill in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine and nearshore resources (including eelgrass, other marine vegetation, and forage fish) – Section 7.4.3 • Vessel spills (including the likelihood of a spill occurring) – Section 13.5 <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and accounted for spill prevention and response measures (response plans, equipment, and personnel). The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. Cumulative impacts from spill risks are discussed in Section 13.6.</p> <p>While the specific impacts associated with a marine spill would be related to the location of the spill, the type of material spilled, and the quantity of material spilled, a number of measures would be implemented to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A

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		<p>a Washington State Important Bird Area. The unique environment, wildlife and eel grass beds of Padilla Bay also attract many scientists and students to the area to carry out important estuarine research. Given Padilla Bay’s sensitive nature, unique legal status, and importance to science, every probable adverse impact to the Bay and all fish, wildlife and plant resources that depend upon it must be considered significant by the FEIS.</p>	<ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources of terrestrial and marine birds (including important marine plants such as eelgrass). In addition, xylene and reformate are insoluble and less dense than water and in the event of a spill it would typically occur as a thin slick on the surface with dispersion of up to 6 meters (19.7 feet) under extreme mixing conditions. Therefore, eelgrass located in water deeper than 6 meters (19.7 feet) would not be expected to come into contact with xylene or reformate during a spill. Eelgrass in more shallow areas could potentially come into contact with various concentrations of xylene or reformate depending on the depth and mixing conditions at the time of a spill. The status of Padilla Bay as part of National Estuarine Research Reserve System and the Important Bird Area is discussed in Section 6.3.2.2 of the Draft EIS.</p> <p>See Section 3.4 of this Final EIS for further information concerning terrestrial vegetation and wildlife, including marine bird resources. See Section 3.5 of this Final EIS for further information concerning marine and nearshore resources and Section 3.5.2 regarding toxicity of xylene to marine birds and aquatic life. Section 3.9 of this Final EIS discusses additional information regarding marine spills. Additional information regarding agencies responsible for marine transportation, listed species, marine and nearshore resources, terrestrial vegetation and wildlife, marine birds, and marine vessel traffic is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-012	Evergreen Islands	<ul style="list-style-type: none"> • What are the impacts on fish, wildlife, and vegetation? 	<p>Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.</p>
Ch06-013	Evergreen Islands	<ul style="list-style-type: none"> • What are the potential onsite impacts on fish, wildlife, vegetation, wetlands, threatened and endangered species from 	<p>Thank you for your comment. This comment was previously received as part of public scoping and was considered in</p>

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		<p>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> <ul style="list-style-type: none"> • What are the potential offsite impacts on fish, wildlife, vegetation, wetlands, or threatened and endangered species from increased marine vessel operations on the Salish Sea, 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 marine vessel? • What are the 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? 	preparing the Draft EIS.
Ch06-014	Esther Lultikhuizen	The ships/tankers and the refinery plant also emit intense light pollution that impacts birds and other wildlife.	Thank you for your comment.
Ch06-015	Phyllis Dolph	Results of studies in animals indicate that large amounts of xylene can cause changes in the liver and harmful effects on the kidneys, lungs, heart, and nervous system. Short-term exposure to very high concentrations of xylene causes death in animals. Death.	<p>The potential impacts to animals from a xylene spill were analyzed in consideration of the toxicity of xylene, and within the context of: the likelihood of a spill occurring, measures in place to prevent a spill, the modeled extent and duration of spilled material present in the environment, and the potential exposure to animals in the event of a spill. The evaluation is presented in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial animals – Section 6.4.3 • Marine animals – Section 7.4.3.2 • Information on the toxicity of xylene – Section 13.5 <p>Further details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Potential impacts and mitigation measures of unplanned

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			<p>events, including fires, explosions, and spills – Section 9.6</p> <ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Ch06-016	Timothy Manns	<p>We submitted detailed scoping comments for this EIS because of our interest in the ecological importance of Fidalgo Bay Aquatic Reserve and Padilla Bay National Estuarine Research Reserve. We're pleased that the Draft EIS, in Chapter 6, includes detailed information on the importance of these areas to birds. We'll submit detailed written comments, but I'd like to make several suggestions here. First, we're concerned about the analysis of potential impacts to birds and other species if a spill of reformate or xylenes should occur into Padilla Bay. The Draft EIS reassuringly states that the non-[unintelligible] quality of these chemicals in contrast with crude oil [unintelligible]. However, it's not reassuring that the formation of toxic effects could extend over several days. In winter, there can be large accumulations of water fowl and seabirds on the bays. In summer and low tide, many great blue herons forage in the extensive shallow waters. Their nearby nesting area is probably the second largest in the Western U.S. Over several days, the sheen of spilled chemicals would expand widely and affect many birds. The research available to extrapolate the toxic effects on these varied species is very slim. In the 2016 study cited in Appendix 13A of the EIS states there are no known studies focused on bird exposure. And what appears to not be addressed at all is the effect that the decline in forage fish and vegetation, such as eel grass, due to the spill would have on available food resources for [unintelligible] birds. [Unintelligible], for example, feed directly on eel grass. Therefore, we feel there needs to be a closer look at the potential effects of the spill, both short- and long-term on birds.</p>	<p>The Draft EIS analyzed potential impacts on marine and nearshore resources and terrestrial vegetation and wildlife, including marine birds, in the event of a spill in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine and nearshore resources (including eelgrass, other marine vegetation, and forage fish) – Section 7.4.3 • Vessel spills (including the likelihood of a spill occurring) – Section 13.5 <p>The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill.</p> <p>The Draft EIS analyzed potential impacts to forage fish in the following sections:</p> <ul style="list-style-type: none"> • Herring spawning beds, surf smelt, Pacific sand lance, and Pacific herring – Table 7-3 • Forage fish habitat – Section 7.3.3.4 • Marine vessel wakes – Section 7.4.2.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and</p>

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			<p>reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of organisms that use eelgrass as habitat or for direct consumption (such as marine birds). In addition, xylene and reformate are insoluble and less dense than water and in the event of a spill it would typically occur as a thin slick on the surface with dispersion of up to 6 meters (approximately 20 feet) under extreme mixing conditions. Therefore, eelgrass located in water deeper than approximately 20 feet would not be expected to come into contact with xylene or reformate during a spill. Eelgrass in more shallow areas could potentially come into contact with various concentrations of xylene or reformate depending on the depth and mixing</p>

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			<p>conditions at the time of a spill.</p> <p>Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch06-017	Phyllis Dolph	<p>Fidalgo Bay provides foraging and resting grounds for resident and migratory shorebirds and waterfowl. Brant geese, cormorants, peregrine falcons (E&TS), and bald eagles (E&TS), as well as many shorebirds and dabbling and diving ducks comprise the majority of the 239 birds that have been identified in Padilla, Samish, and Fidalgo Bays (See list of observed species, Appendix A Table 1).</p> <p>In addition, a large great blue heron rookery is located on the southeast side of March Point. Birds from this rookery are known to feed in Fidalgo Bay (Antrim et al. 2003). Diverse and abundant bird species use is primarily due to the Bay's location within the Pacific flyway. Eight of the species know to use this area meet the listing criteria for State Endangered, Threatened, or Sensitive Species: the common loon (<i>Gavia immer</i>) and Brandt's cormorant (<i>Phalacrocorax penicillatus</i>), bald eagle (<i>Haliaeetus leucocephalus</i>), Peregrine falcon (<i>Falco peregrinus</i>), great blue heron (<i>Ardea herodias</i>), osprey (<i>Pandion haliaetus</i>), common murre (<i>Uria aalge</i>), and marbled murrelet (<i>Brachyramphus marmoratus</i>).</p> <p>Eight species of birds that specifically use Fidalgo Bay and adjacent areas meet the listing criteria given for species listed by Washington State as Sensitive, Threatened, or Endangered. These are listed below with general status and habitat descriptors:</p> <p>Common Loon (<i>Gavia immer</i>) is a State Candidate species that utilizes the shallow protected areas of the reserve for staging and wintering.</p>	<p>These species are discussed in the Draft EIS in Chapter 6. The osprey is not called out specifically in the Draft EIS; however, it would fall under the category of other migratory birds protected under the Migratory Bird Treaty Act and potential impacts would be similar to those of the other migratory species.</p> <p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would also not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material.</p>

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		<p>Brandt's Cormorant (<i>Phalacrocorax penicillatus</i>) is a State Candidate species found in the aquatic reserve.</p> <p>Bald eagle (<i>Haliaeetus leucocephalus</i>) nesting sites are located on Weaverling Spit and others occur near Fidalgo Bay, primarily near West Guemes Channel, Hat Island, and Guemes Island. Eagles utilize the bay for foraging.</p> <p>Peregrine falcon (<i>Falco peregrinus</i>) is a State Endangered Species. Peregrine falcons from a nest on Guemes Island feed in the bay.</p> <p>Great Blue Heron (<i>Ardea herodias</i>) maintain a rookery located on the southeastern portion of March Point. This is the largest heron rookery in the state, and has been increasing in size. This heronry is becoming more critical for their survival as it becomes larger in size at the expense of other smaller ones (Essinger in draft). Herons routinely feed on small fish in the shallow waters of Fidalgo Bay, and use the shoreline in the bay including upper intertidal habitat, shoreline perches and riparian vegetation.</p> <p>Osprey (<i>Pandion haliaetus</i>) nest sites have been located inland in close proximity to the bay. Osprey regularly feed on fish from the waters of Fidalgo Bay.</p> <p>Common Murre (<i>Uria aalge</i>) is a State Candidate species. The common murre feeds on small forage fish that are found in Fidalgo Bay.</p> <p>Marbled murrelet (<i>Brachyramphus marmoratus</i>) is a State Endangered Species. Annual aerial surveys from 1992-99 (Nysewander, WDFW) consistently observed 1 to 2 marbled murrelets in Fidalgo Bay.</p>	<p>Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. The marbled murrelet is further discussed in Section 3.4.1 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-018	Skagit Audubon Society, Timothy Manns	<p>Skagit Audubon offers the following comments and suggestions on the draft environmental impact statement (EIS) prepared for this multi-part project.</p> <p>1. Please update and correct references to the Marbled Murrelet, a seabird listed under both state and federal endangered species acts.</p> <p>We are pleased that the draft EIS includes information on the</p>	<p>Additional information about the status of the marbled murrelet and sandhill crane is discussed in Section 3.4 of this Final EIS.</p>

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		<p>importance to birds of the two reserves bordering the Tesoro Refinery, particularly the waterfowl and seabirds wintering in large numbers and to Great Blue Herons, which are abundant year-round. The heronry (nesting area) near the refineries is probably the second largest in the western U.S., numbering over 600 nests in some years.</p> <p>The draft EIS' information about the Marbled Murrelet's presence on the bays and along the marine transportation route is neither current nor complete. The Chapter 6 chart of listed species (Table 6-6, page 6-18) indicates this seabird is designated "threatened" under state law. Please correct this statement to reflect the Washington State Fish & Wildlife Commission's December 2016 decision changing the designation to "endangered" due to the murrelet's rapid population decline.</p> <p>Table 6-6 further notes that the marbled murrelet has been observed on Fidalgo Bay and "probably" occurs elsewhere in the study area. Please revise this to state that the species is regularly present many other places along the marine vessel transportation route; in Guemes Channel and among the San Juan Islands, for example, where it would be displaced more frequently due to any increase in marine vessel traffic. It is also now understood that marine areas off the northern Olympic Peninsula are of special importance as foraging areas for this declining, listed species. These too are along the marine vessel transportation route for the Tesoro project.</p> <p>We note that the geographic scope of the draft EIS (pages 1-9 and 1-10) includes, "... the marine vessel transportation route through the Strait of Juan de Fuca to the open ocean. The edge of U.S. territorial waters in the Pacific Ocean, approximately 12 nautical miles seaward of the entrance to the Strait of Juan de Fuca, was selected as the western boundary of the study area." Marbled Murrelets use marine waters at many points along this route. There is an abundance of current information on this subject because of Washington Department of Natural Resources' preparation of a long-term strategy for managing state trust lands on which Marbled Murrelets depend for nesting habitat. The preparers of the Tesoro draft EIS should use the latest Marbled</p>	

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		<p>Murrelet research to inform the analysis of potential impacts from the predicted increase of 120 additional passages by tankers and articulated tug barges.</p> <p>The draft EIS in several places dismisses this increase as a potential source of adverse effects because it would be a small percentage increase, particularly if the Trans Mountain pipeline to Vancouver expansion happens as proposed (for example, at page ES-17 considering air quality impacts, page ES-18 concerning vessels' disruption of marine birds, and again on page 6-39). However, an increase is an increase, and potential impacts should not be judged as simply relative to the total potential harm. Any increase must be seen as contributing to the whole and not dismissed because lesser in scale (page ES-18: "... cumulative impacts on marine birds are not anticipated to be significant)." Rather, there should be a discussion of ways to mitigate these recognized impacts, especially on such species as the ESA-listed Marbled Murrelet. Subject matter experts should be consulted on whether avoiding foraging areas during breeding season, for example, when murrelets are making lengthy, dangerous, and energy-intensive flights inland to feed nestlings could adequately help reduce impacts of the additional vessel transits.</p> <p>We appreciate the frank admission on page ES-19, speaking of the ESA-listed Southern Resident killer whales, that, "... the proposed project would contribute to potential cumulative impacts on the Southern Resident killer whale population." The final EIS should include the results of consultation with Marbled Murrelet biologists on the cumulative effects of the Tesoro CPUP on the murrelet too.</p> <p>Just as the draft EIS notes the unacceptability of additional impacts to the listed Southern Resident Killer Whale, it should also acknowledge that any addition to the number of passages by large marine vessels along the marine vessel transportation route which the draft EIS describes for this project would likely impact the Marbled Murrelet. Because this species is in serious decline, any additional impact should be recognized as significant. Potential effects include displacement of the birds in their foraging areas through the passage of large vessels and the associated engine</p>	

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		<p>noise and the effects from possible spills or leaks due to collisions, groundings, or faulty equipment.</p> <p>We believe, therefore, that the conclusion that the potential effects of this project on the Marbled Murrelet would be “less than significant” (p.6-37 “6.5.2.1. Marbled Murrelet”) is based on incomplete as well as outdated information. The final EIS must correct the information about the Marbled Murrelet’s listing and its distribution in the study area, review and apply current research, and devise effective mitigation, if any is possible. If effective mitigation is not possible in the opinion of qualified subject-matter experts, that should be clearly stated.</p>	
Ch06-019	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>Possible Impacts to Waterfowl</p> <p>The DEIS indicates that Marbled Murrelet, Short Tailed Albatross, and Streaked Horned Lark are 3 federally endangered bird species that might be found in the project area but do not nest or breed there. [DEIS 631] The DEIS assumes that no significant impacts will result to these endangered species in the event of a spill as they don’t nest in and/or are rarely found in the area, but this is a false assumption. The project area provides foraging and socializing habitat (supportive of breeding) for various listed and/or protected bird species, therefore the Xylenes Project could negatively impact or cause harm to these endangered species. Parts of the study area are mapped as supporting regular waterfowl concentrations, which are listed as locally important under the Skagit County Critical Areas Ordinance. In addition, the study area provides important habitat for great blue herons (<i>Ardea herodias</i>) and the western high arctic (or graybellied) subpopulation of brant (<i>Branta bernicla</i>).” [DEIS 614] We suggest that the County closely look at the potential impacts to birds and waterfowl as a result of the Xylenes Project, require more protective best management practices, ensure that all endangered species are identified and protected, and ensure that impacts including habitat loss are properly mitigated.</p>	<p>Additional detail on the analysis of potential impacts on marine birds resulting from a spill of xylene or reformate is included in Section 3.5.2 of this Final EIS. No studies were identified that assessed the acute toxicity of inhalation or ingestion of xylene or reformate in birds. Therefore, it is uncertain if lethal or sub-lethal effects would occur in the first 36 hours following a spill when the chemicals could be present in a slick on the water surface and is undergoing the volatilization process. The spilled products would be gone in 60 hours (less than 3 days); however, the most significant volatilization would have occurred during the first day of the spill. Due to the limited data, the impacts to marine birds in the event of a worst-case or maximum most probable spill scenario were conservatively estimated to be potentially significant for those birds that are likely to be present in the study area (see Section 6.4.3.3 of the Draft EIS).</p>
Ch06-020	Mark Perry	As you continue the environmental review, please ensure that the Final EIS:	The Draft EIS analyzed the special status of the marbled murrelet and potential impacts from the proposed project to the species

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		<p>...</p> <p>requires comprehensive study on the potential impact to the endangered (state designation) marbled murrelet</p>	<p>and its habitat. Status of the marbled murrelet and potential impacts from the proposed project are discussed in Table 6-6 and Section 6.5.2.1 of the Draft EIS.</p> <p>Additional information regarding agencies responsible for regulating special status species is provided in Table 2 in Section 3.1 of this Final EIS. The marbled murrelet is further discussed in Section 3.4.1 of this Final EIS.</p>
Ch06-021	Tim Colton	<p>These industrial vessels are a disturbance to valuable wildlife such as Great Blue Herons</p>	<p>The Draft EIS analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3. The potential impacts on wildlife resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Disturbance to endangered, threatened, and migratory birds – Section 6.5.1 • Disturbance to other bird species, such as great blue herons – Section 6.4.2.3 • Potential impacts to marine mammals, turtles, and fish – Section 7.4.1 and Section 7.4.2 <p>The shipping lanes that marine vessels would use are located in deep waters, away from the typical shoreline foraging habitat for great blue herons. Marine vessels would travel closer to the shore when docking at the wharf, although they are likely to operate at low speeds in this area, which would reduce disturbance to the herons. Waves produced by vessel movement might temporarily disrupt foraging of great blue herons.</p> <p>Additional information regarding marine birds is provided in Section 3.4 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-022	David Robison	<p>As humans, we have already altered the local environment enough and must protect the remaining wildlife from further degradation.</p>	<p>The potential impacts to wildlife and measures to protect wildlife are described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife – Chapter 6 • Marine wildlife – Chapter 7

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			Additional information is provided on marine and nearshore resources, including Southern Resident killer whales, marine birds, and loggerhead sea turtles, in Section 3.5 of this Final EIS.
Ch06-023	Arlan Kosters	Personaly working at Tesaro I have seen more birds Geese,Eagles ,Ducks ect... inside the gates in spaces that are set up to help make shure water run off and such doesn't hurt the enviroment, these birds nest and raise there young until they head north it is quite a freindly site.	Thank you for your comment.
Ch06-024	Anne Elkins	Environmental Health The fact sheet states “Impacts on noise sensitive areas due to noise from construction or operations, including marine vessel traffic” are “Less than Significant”. I am concerned about the heron rookery, which, as you hopefully realize, is one of the largest in the country. The birds seem to be thriving at this point, but with every additional stressor added to their environment (potentially harmful chemicals from a spill getting into their food sources, increased noise from construction, more toxic emissions) the risk of impacting them increases.	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. This evaluation included consideration of the March Point Heronry. The potential impacts and control measures are outlined in the following sections:</p> <ul style="list-style-type: none"> • Disturbance due to noise during construction – Section 6.4.1.4 • Disturbance due to noise during operations – Section 6.4.2.1 • Disturbance due to night-time lighting at the refinery – Section 6.4.2.2 • Impacts associated with marine vessels – Section 6.4.2.3 • Impacts due to spills at the refinery – Section 6.4.2.3 • Impacts due to spills to the marine environment – 6.4.3.3 <p>Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources of the great blue heron.</p> <p>The proposed project area is an active industrial facility and noise from construction is not expected to substantially differ from current noise levels.</p>
Ch06-025	Arlene French	My concerns are how any accidents would impact the Heronry...	The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could

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			<p>temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformat are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would also not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformat evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-026	Robyn Hallonquist	I would like the EIS to address the environmental impacts of... the increased production of plastics which contribute to pollution and	Mixed xylenes are a key component for manufacturing plastics as well as many other consumer products such as medical films and

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		harm wildlife.	x-rays, synthetic fibers, spray paints, solvents, and cleaners (see Chapter 1 of the Draft EIS). The EIS does not attempt to analyze the impacts from the end use of mixed xylenes. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). The lack of information and uncertainty about the specific end uses of the mixed xylenes would require significant assumptions resulting in a speculative analysis that would not result in useful information for agency officials.
Ch06-027	Phyllis Dolph	<p>Risks to Great Blue Heron: The potential impact of a major oil spill on the regional heron population could be significant due to the close proximity of major breeding centers and foraging grounds to oil ports and refinery complexes. The largest breeding colony in the state and its associated feeding areas are located directly adjacent to the March Point facilities.</p> <p>Given unexplained recent mass abandonment of colonies (Eissinger in draft), major geographic shifts in breeding population and population decline in certain areas, consistent monitoring and status of the Great Blue Heron population is necessary in order to document changes.</p>	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would also not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material.</p>

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			<p>Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-028	Skagit Audubon Society, Timothy Manns	<p>2. The draft EIS does not evaluate potential adverse effects on the state-listed Sandhill Crane.</p> <p>Section 6.5.2 “Threatened and Endangered Species (State and Federal)”, page 6-37, omits the Sandhill Crane. As noted in Table 6-B.1 on page 6-B-1, this species is state-listed as endangered. It occurs in upland areas of March Point during migration, and photo documentation is available from a sighting close to March Point Road last year, as a recent example. The crane uses the same types of upland areas as does the Great Blue Heron for foraging and resting and will associate with them.</p> <p>The final EIS must correct the omission of this listed species, analyze potential direct, indirect, and cumulative impacts, and describe mitigation measures.</p>	<p>See Section 3.4.2 and Table 4 in Section 3.4.1 of this Final EIS regarding sandhill cranes. Additional information regarding agencies responsible for regulating listed species and terrestrial wildlife, including birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-029	Anne Winkes	<p>I have observed as a citizen science volunteer at the Samish Island heronry throughout the breeding season for the past five years. As my knowledge of the Great Blue Heron as expanded, so has my appreciation of threats to the existence of this iconic bird, known and loved by so many in Skagit County.</p> <p>I am writing because I am very concerned about the threats posed by Tesoro’s CPUP Refinery Expansion Project to the Great Blue Heron colonies located on Samish Island and at March Point. Foraging studies of the Great Blue Heron in Skagit County have</p>	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point and Samish Island Heronries. Spill modeling demonstrates that spilled xylene and reformatate would not be expected to impact the terrestrial environment where the March Point and Samish Island Heronries are located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformatate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be</p>

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		<p>made it clear that these colonies are interrelated, and share foraging grounds, including the eel beds and mudflats of both Fidalgo Bay and Padilla Bay.</p> <p>The CPUP threatens the Great Blue Heron colonies with oil pollution and xylene exposure, both of which could greatly diminish if not eradicate the colonies.</p> <p>The threat of oil pollution comes from the project's need for oil for production of xylene to be brought to the refinery as Baaken crude oil in unit oil trains and as reformat on tankers. The threat of xylene exposure comes from Tesoro's plan to export the xylene via tanker.</p> <p>The draft EIS addresses these threats in a superficial manner. No in depth analysis of the impacts is contained in the DEIS and consequently no appropriate mitigation or alternative action is proposed.</p>	<p>unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would not be expected to result in an increase in human activity in the vicinity of the heronries.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformat evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS, and further information concerning terrestrial vegetation and wildlife, including marine bird resources, is discussed in Section 3.4 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources, and terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch06-030	Anne Winkes	<p>Xylene is a known toxin. No studies have been done on its impact on Great Blue Heron but the DEIS assures us that it will cause them no harm. Lack of data is not proof that harm does not occur. The final EIS must either include specific data that proves xylene will cause no harm to the Great Blue Heron, or must acknowledge the possibility that harm may indeed occur.</p> <p>The DEIS discusses the impacts on terrestrial vegetation from fire, and states that “If a fire occurred and spread outside the proposed project area, the fire could damage wildlife habitat and kill or injure wildlife.” It then attempts to reassure us that “ If a fire did occur, terrestrial wildlife would be expected to actively avoid the fire, thereby avoiding direct mortality or injury.” and further concludes “impacts on terrestrial vegetation as a result of a fire during construction activities would be less than significant.” The DEIS fails to mention the impact of fire on voles. Great Blue Heron feed on voles early in the breeding season and throughout the winter. The final EIS must analyze the impact of fire on the presence of voles given the proximity of the project to the March Point heronry and the dependence of the Great Blue Heron on an adequate supply of voles to provide them with adequate nutrition during particular stages of their life cycle.</p> <p>The DEIS says “Xylene is considered to have a moderate-to-low acute toxicity for aquatic organisms with a small amount of variation between each isomer2 (WHO 1997; USEPA 2005). Due to the quick degradation, quick volatilization, and the low-to-moderate toxicity to organisms, the World Health Organization (WHO) has ranked the overall risk of xylene isomers to the aquatic environment as low (WHO 1997).” This statement is meant to be reassuring but the DEIS doesn’t consider the possibility that Great Blue Heron might be foraging at the time of a spill and ingest fish with an immediate contact to the spill. The final EIS must address the impact of a xylene spill on Great Blue Heron foraging at the time of a spill.</p>	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point and Samish Island Heronries. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point and Samish Island Heronries are located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would not be expected to result in an increase in human activity in the vicinity of the heronries.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS,</p>

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			<p>and further information concerning terrestrial vegetation and wildlife, including marine bird resources, is discussed in Section 3.4 of this Final EIS. Additional information regarding agencies responsible for listed species for marine and nearshore resources, and terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Voles are discussed in Section 6.3.2.1 of the Draft EIS and potential impacts to terrestrial wildlife, including voles, due to fire are discussed in Section 6.4.3.1 of the Draft EIS.</p>
Ch06-031	Anne Winkes	<p>The DEIS says “Toxicity of mixed xylenes and reformate would be dependent on the spill size (concentration), spill duration, and the organism exposed to the chemicals on the water surface. The highest risks to wildlife would result from a spill in an area with high concentrations of prey, during the breeding season, during migration, or during the winter where many birds are concentrated.” The DEIS does not address the length of the breeding season of the Great Blue Heron which lasts from approximately late February through early August, nor does it address the concentration of Great Blue Heron feeding along the shorelines of Fidalgo and Padilla Bays given the proximity of the March Point and Samish Island colonies to these bays. The length of their breeding season means that there are many months during which a spill could impact Great Blue Heron, and their concentration in this area during the lengthy breeding season means that the impact on the health of the colonies could be huge. The final EIS must address this omission.</p> <p>The DEIS says that “Based on the non-persistent nature of mixed xylenes and reformate, impacts on terrestrial wildlife are expected to be short-term (less than 3 days). A spill is therefore unlikely to directly impact marine bird habitat for more than a few days.” Those few days may adversely impact the reproductive success of the March Point and Samish Island colonies, and that threat to the heronries must be addressed in the final EIS.</p> <p>In conclusion, the health of the Great Blue Heron indicate the health of the environment and symbolize the quality of life enjoyed by the residents of Skagit Valley, and appreciated by its</p>	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point and Samish Island Heronries. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point and Samish Island Heronries are located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would not be expected to result in an increase in human activity in the vicinity of the heronries.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate</p>

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		<p>many visitors. Skagit County needs to do its job and conduct thorough studies on the impact of Tesoro’s proposed CPUP on the Great Blue Heron colonies at March Point and on Samish Island.</p>	<p>quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS, and further information concerning terrestrial vegetation and wildlife, including marine bird resources, is discussed in Section 3.4 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources, and terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-032	Anne Winkes	<p>On 5/8/14 Ann Eissinger a well known Great Blue Heron biologist wrote in a letter to the Skagit County Planning and Development Services, “ Finally, it is imperative to stress that Great Blue Herons are inextricably linked to the ecosystem in which they live. In 2007, the Puget Sound Nearshore Partnership defined the Great Blue Heron as a Valued Ecosystem Component and described the complex role herons play in the Puget Sound ecosystem http://www.pugetsoundnearshore.org/technical_papers/herons.pdf. At March Point, the breeding colony is dependent on the foraging habitat and prey base of Padilla Bay. The risk to the heron colony is already very real from the current operations of industrial facilities, rail and ship transport and oil refineries located on the shoreline of Padilla Bay. These risks will be compounded by additional rail transport, off loading, processing and export of oil by these facilities. The numerous risks need to be publicly disclosed, impacts analyzed and alternatives presented before additional rail capacity is allowed or denied.” The same risks apply to the Samish Island heronry. Adverse impacts to the Great Blue Heron are not mitigable.</p>	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point and Samish Island Heronries are located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those</p>

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Ch06-033	Pilchuck Audubon Society, Allen Gibbs	We are mindful of the great blue herons which occupy forest land near the refinery, and their utilization of the tide and shore lands along with many waterfowl and seabirds we observe when on our frequent escorted and personal birding trips in March Point, Fidalgo and Padilla bays.	Thank you for your comment.
Ch06-034	Mary Heath	As well, wildlife can only flourish if we protect our resources.	Thank you for your comment.
Ch06-035	Linda Talman	In addition, you are right next to a heron rookery. What is the	The Draft EIS analyzed the potential impacts to birds from

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		effect of xylene production on egg shell thickness and in genetic changes in herons.	<p>construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would also not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and,</p>

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			<p>terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch06-036	Mark Perry	<p>As you continue the environmental review, please ensure that the Final EIS:</p> <p>...</p> <p>requires comprehensive study on the impact to the 2nd largest West Coast nesting site for Great Blue Herons</p>	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would also not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe.</p>

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			<p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>

Chapter 7: Marine and Nearshore Resources

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Ch07-001	Skagit Audubon Society, Timothy Manns	<p>4. Too little is known about the effect of xylenes and reformate on birds and their habitat to confidently state a spill or other occurrence would result in no significant impact.</p> <p>The research available to extrapolate the toxic effects on varied species of birds and other wildlife is very slim. The 2016 report titled “Fate and Behavior Analysis in the Marine Environment: Reformate and Mixed Xylenes” (draft EIS Appendix 13-A) states, “There are no known studies focused on bird exposure.” It is not adequate to extrapolate from the known effects of crude oil (p.7-56) or other substances than xylenes and reformate and then with confidence conclude that effects would not be significant. It appears clear that there is no basis for this statement. To the best of our knowledge, the analysis required under SEPA is not limited to applying already existing research and may require additional scientific studies to adequately evaluate potential impacts. The SEPA Handbook at Section 2.6 (Table 3) implies as much.</p> <p>In addition to direct effects, a spill or other incident would have indirect effects on birds; that is, by adversely impacting what they eat. There appears to be no attention given to the effect that decline in forage fish or degradation of vegetation such as eelgrass would have on food resources for wintering birds. Eel grass is central to the diet of Brant, for example. As noted in the draft EIS, the entire population of the western high arctic (or gray-bellied) subpopulation of brant winters on Fidalgo, Padilla, and a few other nearby bays. Forage fish are the mainstay of the diet of loons, marbled murrelets, and certain diving ducks. Other diving ducks feed on shell fish. While it is stated that spilled xylenes would dissipate into the atmosphere rather than dissolving in the water column, the statement appears elsewhere in the draft EIS that xylenes do disperse to some depth in the water column under turbulent conditions. Page ES-26 refers to xylenes and reformate potentially mixing in water to 9 or as much as 19 feet (also pages 7-55 and 7-57), deeper than much of Padilla and Fidalgo Bays for a significant portion of each day. What happens when a dropping</p>	<p>Additional detail on the analysis of potential impacts on marine birds resulting from a spill of xylene or reformate is included in Section 3.5.2 of this Final EIS. No studies were identified that assessed the acute toxicity of inhalation or ingestion of xylene or reformate in birds. Therefore, it is uncertain if lethal or sub-lethal effects would occur in the first 36 hours following a spill when the chemicals could be present in a slick on the water surface at a thickness level greater than 0.1 µm and is undergoing the volatilization process. During the volatilization process, chemicals with vapor pressures greater than atmospheric pressure would vaporize into the ambient air. For a spill, 99.5 percent of all products would be gone in 60 hours (less than 3 days); however, the most significant volatilization would have occurred during the first day of the spill. Due to the limited data, the impacts to marine birds in the event of a large-volume unplanned spill (worst-case or maximum most probable spill scenario in the Draft EIS) were conservatively estimated to be potentially significant for those birds that are likely to be present in the study area (see Section 6.4.3.3 of the Draft EIS).</p> <p>As discussed in Sections 6.4.3.3 and 7.4.3.2 of the Draft EIS, a slick thickness of 0.1 µm (one order of magnitude less than the literature toxicity threshold of 1 µm) was selected as the conservative threshold for potential impacts. The toxicity threshold of 1 µm slick thickness was the minimum cutoff used in the biological effects model used by NOAA in their assessments of black oil (French-McCay 2009, French-McCay et al. 2002, French-McCay et al. 2004). The Draft EIS acknowledged that this slick threshold is a conservative estimate of toxicity for mixed xylenes and reformate since the NOAA model threshold is based on oil, which does have some volatile components but also has many other toxic components in the mixture that are not found in mixed xylenes and reformate. Additionally, many of the adverse effects from oil slicks are attributed to the persistent, highly toxic, high molecular weight compounds; none of these components are present in mixed xylenes and reformate, as</p>

ID	Contact	Comment Text	Response
		<p>tide deposits a xylene or reformat sheen atop eel grass and shellfish beds or on forage fish eggs? Page 5-60 states that kelp beds and eelgrass meadows “would remain largely intact” after a spill, but then there is no follow-through analyzing the potential effects of the creatures living among these plants or feeding on them. What happens when xylenes volatilize, blow towards birds in the air or on the water, and are then inhaled? There is, of course, the same concern for human beings downwind of such an event. Page 7-57 states, “The spatial extent of a spill varies depending on seasonal and tidal conditions. In the modeled worst-case scenario, the area covered by spilled material was estimated at up to 23.5 square miles of surface water, and up to 11.5 miles of shoreline.” What then of the effects on foraging herons, ducks and seabirds on the water - - not from oiling but from inhaling and ingesting? Also, effects on forage and fish and crabs and inverts they eat? The draft EIS outlines no mitigation for this low probability but very high consequence event.</p>	<p>noted in Chapter 13 of the Draft EIS. Therefore, impacts to birds based on the 0.1 µm threshold are very conservative estimates.</p> <p>Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level. The Draft EIS discusses the spill response measures and capabilities that would be used to protect sensitive marine habitats in the following sections:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 <p>Xylene and reformat are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources.</p>
Ch07-002	Jeanne Poirier	<p>Any increase in tanker traffic through the sensitive marine area of the San Juan Islands and Salish Seas needs to be thoroughly reviewed. There will always be more poisons and business from humans, either profiting or using the end products. We are NOT able to create more Orca whales or marine life. Indeed, with every train, tanker passing we risk incredible devastation. The addition of xylene to LNG terminals and other fossil fuel enterprises is ludicrous - as I type on a plastic computer, sigh.</p> <p>Please do everything in your power to protect people, marine life, water quality and demand Tesoro complies with all risks with its xylene production plan.</p>	<p>The potential impacts resulting from increased marine vessel traffic through sensitive marine areas of the San Juan Islands and the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Designated or permitted land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2 • Aesthetics and views – Section 10.5.2 • Southern Resident killer whales and marine wildlife – Section 7.4.2 <p>Measures that are being taken to protect people, marine life, and water quality are discussed in the following sections of the Draft</p>

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			<p>EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Water quality – Chapter 5 and Section 7.4 • Marine life – Section 6.4 and Section 7.4 • People – Chapter 9
Ch07-003	Dianna MacLeod	<p>No company should be allowed to produce or transport any substance or chemical that endangers the health of our oceans, marine creatures, birds, or wildlife.</p> <p>Facilities that are located close to the water must be scrutinized closely for potential harms.</p>	<p>During the review of Tesoro’s application for a Shoreline Substantial Development Permit, Skagit County determined that the proposed project may have a significant adverse impact on the environment, and therefore an EIS was required as described in Section 1.3 of the Draft EIS. Potential impacts related to those portions of the proposed project that are located close to the water are discussed in the Draft EIS in the following sections:</p> <ul style="list-style-type: none"> • Marine birds and terrestrial wildlife – Section 6.4 • Special status species including marine birds, shorebirds, waterfowl, and other wildlife species in the marine environment – Section 6.5 • Marine and nearshore resources – Section 7.4
Ch07-004	Kate Waind	<p>This refinery would bring an additional five tankers per month through the Salish Sea, which endangers native wildlife and opens doors for toxic spills and oceanic pollution.</p>	<p>Potential impacts to wildlife as a result of increased marine vessel traffic and increased spill risk are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine birds and wildlife – Sections 6.4, 6.5, and 7.4 • Spills and information on toxicity – Section 13.5
Ch07-005	Dori Bailey	<p>This is have a huge impact on the water.</p>	<p>Potential impacts on water resources are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Freshwater resources – Section 5.3 • Groundwater – Section 5.4 • Wetlands – Section 5.5 • Marine waters – Section 7.4

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			Additional information on potential impacts to the marine environment is discussed in Section 3.5 of this Final EIS.
Ch07-006	Sue O'Donnell	My husband & I live across Fidalgo Bay from the 2 Anacortes refineries. We watch the tankers come and go, carefully guided by the tugboats, but have questions about what all this traffic does to the shoreline and wildlife. Many folks testified about harm to shore birds and the Orca whales. The EIS fact sheets available at the hearing deem most of the potential impacts to shoreline and wildlife "less than significant". I strongly disagree!!!	Thank you for your comment.
Ch07-007	Joanne Schoettler	So, our whales and our marine life is really under stress. And they're going to be even more under stress. Then, we're going to slap that pipeline as much we can. We're going to stop it. And we're also going to stop this, because we have to really think about our marine life. You know, I was just going -- I brought up -- I brought a native with me, and one of the things we were looking at -- at the water in Anacortes -- and it's weird to have that, as this person said, green water. Why is it so green out by that area? Usually, water isn't that green. I don't know what's in that water, but I do have a concern. And then, you know, there's also the heron in here -- you know, what's the impact to marine animals?	<p>Baseline information on water quality in the study area is discussed in Section 7.3.1.1 of the Draft EIS. The potential impacts on the marine environment, wildlife, and marine life resulting from the proposed project are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife and marine birds – Section 6.4.3 • Southern Resident killer whales and marine wildlife – Section 7.4.2 (and Section 3.5.1 in this Final EIS) • Designated or permitted land and shoreline use – Section 10.3.2 <p>Measures that would be taken to protect marine life and water quality are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls to prevent a spill at the refinery – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Wildlife and marine life – Section 6.4 and Section 7.4 • Water quality – Chapter 5 and Section 7.4 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis</p>

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			<p>included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would also not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2 • Spills to the marine environment – Section 6.4.3.3 <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-008	Will Golding	What will be the impact on marine habitats if there is increased shipping?	<p>The Draft EIS analyzed the increase in vessels as a result of the proposed project in Section 13.3.</p> <p>The potential impacts to marine habitats resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine birds – Sections 6.4.2 and 6.4.3 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Land and shoreline use, recreation and views – Sections 10.3.2, 10.4.2, and 10.5.2 • Treaty and traditionally used resources – Section 11.5.2.3 <p>The Draft EIS discusses cumulative impacts from increased vessel</p>

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			<p>traffic in the following sections:</p> <ul style="list-style-type: none"> • Marine birds – Section 6.6 • Southern Resident killer whales and other marine resources – Section 7.7 • Land and shoreline use, recreation and visual resources – Section 10.6
Ch07-009	Judy Avery	Padilla Bay is a beautiful area near Anacortes and everything possible must be done to protect it from further contamination from Tesoro. Marine estuaries are important and they must be valued.	Thank you for your comment.
Ch07-010	Millie Magner	Tesoro's proposal will add 120 more barges and tankers per year of full of toxic petrochemicals through the already crowded and narrow passages of the Salish Sea – threatening the endangered salmon and southern resident orcas.	Thank you for your comment.
Ch07-011	Mark Meeks	Please protect the shoreline from pollution due to any action allowed.	Thank you for your comment.
Ch07-012	Larry Weymouth	The analysis of the indirect impacts of increased xylene production should consider the consequential reckless disposal of a multitude of plastic products in public waters and lands, where they are fatally ingested by fish and birds and litter the landscape. This negative impact to the environment outweighs any questionable public benefit from increased xylene production. Increased plastic recycling would provide any possible public benefit better than increased xylene production	Mixed xylenes are a key component for manufacturing plastics as well as many other consumer products such as medical films and x-rays, synthetic fibers, spray paints, solvents, and cleaners (see Chapter 1 of the Draft EIS). The EIS does not attempt to analyze the impacts from the end use of mixed xylenes. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). The lack of information and uncertainty about the specific end uses of the mixed xylenes would require significant assumptions resulting in a speculative analysis that would not result in useful information for agency officials.
Ch07-013	Ronna Loerch	1. This will increase vessel traffic in the Salish Sea and we already know what harms this will incur. We have research that such traffic harms local cetaceans and other wildlife.	Thank you for your comment.

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Ch07-014	Rob Burnett	It seems every day we hear of another plan to put the Salish Sea at risk. This plan is wrong on so many levels. A catastrophic leak (or worse, a shipping disaster) of Xylene poses a serious risk to sea life. In addition to this unacceptable risk, the additional shipping traffic increases underwater noise affecting all sea life, including the endangered Orca population.	Thank you for your comment.
Ch07-015	Elizabeth Sawyer	Our Salish Sea is an ecosystem already fraught with issues. Between a keystone species on the brink of extirpation (our southern resident orcas) and the salmon which have been struggling against dams and overfishing and disease from farmed fish, in addition to many other ecological issues such as Sea Star Wasting Disease and countless invasive species, we can not afford another "clean project" that puts our waters at risk. Additional sound pollution that put our marine mammals at risk, as well as the risk of deadly chemical spills that could affect hundreds of diverse marine species, are only the primary reasons we human residents of the Greater Salish Sea region must minimize our impact. Thus, as it stands, especially considering Tesoro's involvement in past chemical spills, I cannot in good conscience condone this project. Keep your risky business practices out of our endangered waters and conduct or elsewhere.	Thank you for your comment.
Ch07-016	Fidalgo Bay Aquatic Reserve Citizen Stewardship Committee	The Fidalgo Bay Aquatic Reserve includes all the aquatic marine land south of a line roughly east-west from Crandall Spit on the March's Point side across to the Anacortes side. It is subject to great environmental impact from any sort of chemical spill, especially during winds, tides, and currents that would tend to move water southward. Many different birds, fish, plants, and shellfish live there or use it for foraging, sheltering, and as a nursery for young. That diversity is one of the reasons for it being an Aquatic Reserve.	Thank you for your comment.
Ch07-017	Evergreen Islands	<ul style="list-style-type: none"> • What are the potential offsite impacts on of the project on the long term viability and survivability of Southern Resident Killer Whales, Blue Whales, Fin Whales, Humpback Whales, Northern Pacific Right Whales, Sei Whales, Sperm Whales, Leatherback Sea 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.

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		Turtles, American White Pelican, and the Brown Pelican from increased marine vessel operations on the Salish Sea,	
Ch07-018	Beth Wallace	I am very concerned about the proposed xylene shipments through our waters. The threat to endangered orcas and salmon is great. The threat to other marine life and the entire ecosystem of the Salish Sea is far beyond any benefit.	Thank you for your comment.
Ch07-019	Marlena Kellogg	really please don't build this refinery in this area. We really care about her water and the bio-region of the Salish Sea, and by putting in a refinery and ships coming in and out, it's definitely going to impact our ecosystem in a really negative way and we'll find, you know, some way to communicate in a court room about this but what it really comes down to is your decimating in the environment and the people that live here and have lived here for centuries really don't appreciate you guys being here. So hope to see you in court bye.	Thank you for your comment.
Ch07-020	Gwen Hunter	And our ocean relations are struggling to survive now because of existing pollution. They cannot handle any more.	Thank you for your comment.
Ch07-021	Maureen Scheetz	The San Juan Islands, Fidalgo and Padillia Bay are fragile ecosystems that deserve preservation and respect.	Thank you for your comment.
Ch07-022	Robin McGee	Please do not allow this to happen, our Puget Sound is full of wildlife that will be endangered by this greedy move by the corporation. Thank you!	Thank you for your comment.
Ch07-023	Wendy Bartlett	The exporting of crude oil will only prove catastrophic to the Pacific Northwest regions of Puget Sound, Salish Sea, and Strait of Juan de Fuca. Our salmon populations are dwindling as are endangered orca populations.	The proposed project does not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Ch07-024	Ann Brooking	I am a concerned citizen of Skagit County who opposes proposed Xylene production by Tesoro in Anacortes. Xylene spills' impact on the Salish Sea and marine life is of utmost concern.	Thank you for your comment.

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Ch07-025	Mary Heath	<p>A better review should also be required on possible effects of xylene exposure on marine birds and wildlife, forage fish and eelgrass in Padilla Bay, the protected National Estuarine Reserve adjacent to the refinery. As a member of the Board of Directors of the Padilla Bay Foundation, it is my opinion the EIS falls short in its findings in this area.</p>	<p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS.</p>
Ch07-026	Ed Gastellum	<p>What would be the effect of a catastrophic explosion to the waters of Fidalgo and Padilla Bays and on the communities surrounding the refinery? The Padilla Bay National Estuarine and Research Reserve as well as Fidalgo Bay are Federal and state protected resources and are critical to the local food chain of endangered salmon, a robust crab population and all the marine life that supports this food chain. Millions of dollars have been spent cleaning up past mistakes of polluting the waters and putting some fish at risk particularly in Fidalgo Bay.</p> <p>Tesoro management minimizes the potential ill effects on this marine environment and the hazardous effects of the increased toxic pollutants in this new proposed program. What long lasting pollutants do ships sitting in local waters emit in the waters while sitting and waiting to be loaded? What is the long term risk of a catastrophic event occurring where a ship were to sink in Guemes Channel by the refineries? What would be the negative effect of bulk fuel leaking into the channel adjacent to Fidalgo and Padilla Bays?</p>	<p>An explosion at the refinery is not likely to extend beyond the refinery boundaries and therefore would not be anticipated to impact the waters of Fidalgo and Padilla Bays or the surrounding communities (see Section 9.6.1 of the Draft EIS). Potential impacts on human health from unplanned events (including explosions, fires, and spills) are discussed in Section 9.6.1 of the Draft EIS.</p> <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS and information regarding short-term versus long-term exposures to mixed xylene or reformat is provided in Section 3.6.2 of this Final EIS.</p> <p>Impacts on human health from marine spills could occur if people are near enough to a spill in the event that a fire/explosion occurred, due to the vapors reaching an ignition source (see Section 9.6.2.4 of the Draft EIS). Potential impacts of unplanned events (including fires, explosions, and spills) and controls to prevent and minimize unplanned events are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Impacts on terrestrial vegetation and wildlife from fire or explosion – Section 6.4.3

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			<ul style="list-style-type: none"> • Impacts on human health from air emissions – Section 9.3.2 • Impacts on human health from fire or explosion – Section 9.6.1 • Impacts on human health from spills – Section 9.3.2 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel traffic , vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>Tankships, including tankers and ATBs planned for the proposed project, are designed to retain toxic and hazardous wastes (called Noxious Liquid Substances or NLSs in international Law) aboard the vessel until they can be safely discharged at a Certified Reception Facility ashore. This is required under the International Convention for the Prevention of Marine Pollution (MARPOL) Regulation 7 Annex II. It is also required under U.S. regulations in 33 CFR 158 Subpart C.</p> <p>Any discharge in U.S. waters is a violation of the Federal Clean Water Act and can be punishable by fine and penalties amounting to \$25,000 per day per event. Willful discharges can be punishable by imprisonment. Discharges are also forbidden in Washington State regulations contained in WAC 173-184-015.</p> <p>The long-term risks of a catastrophic spill event, such as a tankship sinking with a full load, are discussed in Chapter 13 of the Draft EIS under the “worst-case scenario” discharge, which includes the discharge of the entire contents of a tankship. Leaks of bulk fuel into Fidalgo and Padilla Bays could occur during both construction (primarily in the vicinity of the refinery wharf) and operation of the proposed project at the wharf and along the marine vessel transportation route (see Section 7.4.3 of the Draft EIS). The potential environmental impacts to specific resources in the event of a marine spill or leaks of fuel are discussed in Chapters 4, 6, 7, 9, 10, 11, 12, and 13 of the Draft EIS, and a summary from each chapter is provided in Section 13.5.8 for each resource topic (see Tables 13-29 and 13-30).</p> <p>Additional information regarding agencies responsible for regulating marine vessels, spill prevention, and spill response is</p>

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			provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9, and additional information regarding fuel leaks is provided in Section 3.9.2.1 of this Final EIS.
Ch07-027	Bob Zeigler	There are two discussions of potential time product would remain in water before dissipating and impacting marine resources if spilled: 12 hours and 3 days. Even if xylene spilled into water does dissipate in 12 hours could that not take a large toll on birds, fish and marine mammals near the water surface that would interact with xylene for those 12 hours?	<p>The analysis in the Draft EIS assumed that 99.5 percent of all products would be gone in 60 hours (less than 3 days), with the most significant volatilization occurring during the first day of the spill. The analysis also accounts for potential effects following potential exposure. Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS.</p> <p>The toxicity of xylene (and reformate) to terrestrial and marine wildlife, including potential impacts from direct contact near the water surface during a marine spill, is discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3 • Marine species, including whales/Southern Resident killer whales, harbor seals, and fish (salmon) – Section 7.4.3
Ch07-028	Jane Brandt	<p>The Salish sea is home to wildlife which is negatively affected by ship noise in their ability to search for food.</p> <p>Protection is needed for the inhabitants of the sea who cannot speak for themselves.</p>	Thank you for your comment.
Ch07-029	Rosette Dawson	Of course, having more big ships per year coming in and out of the dock area increases risk somewhat. I'm hoping the environmental report takes care of impact on sea life (just from the passing of ships, noise etc) and we are certainly hoping that no spills occur.	Thank you for your comment.
Ch07-030	Dana Mueller Keefe	It is reported that up to five additional marine vessels would be used by the refinery each month related to xylene production. Our responsibility to the Salish Sea and it's threatened animal population (including the endangered Orca whales), and our future in general, require the highest possible quality of protection of the air, land, and sea.	Thank you for your comment.

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Ch07-031	Cathern Murphy	Puget Sound Orcas are dying, Fish runs are decimated, toxic algae is everywhere polluting and destroying shellfish and Marine life., human and animal waste fills the sound along with pesticides, toxic heavy metals and spills. Now you want to slip the final bullet that will destroy what little remains of a large body of water that is a life source for marine life and the health of the environment. we must conserve and we must end this archaic fuel source the is destroying the cesspool that is called Puget Sound and the Salish sea	Thank you for your comment.
Ch07-032	Marco de la Rosa	The threats that this project poses to our climate, the vital waters and fisheries of the Salish Sea / Puget Sound and the surrounding community make it clear that this project should NOT be permitted as proposed.	Thank you for your comment.
Ch07-033	Annie Capestany	i grew up in the Puget sound and want to preserve it's beauty and natural diversity.	Thank you for your comment.
Ch07-034	Tom Strawman	Let's continue our good progress in recent years in cleaning up our waters, improving salmon habitat, and keeping these waters secure for both human and animal life alike.	Thank you for your comment.
Ch07-035	Robin Starzman	Consider the final results IF Tesoro is allowed to proceed - including the impact to fish, whales and other wildlife...	<p>The Draft EIS analyzed potential impacts on the marine environment, wildlife, and marine life, including fish and whales, resulting from the proposed project.</p> <p>Potential impacts to the marine environment from construction and operation of this proposed project are described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife and marine birds – Section 6.4 • Southern Resident killer whales and marine wildlife – Section 7.4 <p>Additional information regarding agencies responsible for regulating marine and nearshore resources is provided in Table 2 in Section 3.1 of this Final EIS. Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>

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			Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS.
Ch07-036	Louise Dustrude	<p>Those of us who live here [the San Juan Islands] have been working for years to defend our waters and our shorelines and "our" orca whales from dangerous substances, but this one sounds even worse than most.</p> <p>Please consider the health of the human and animal residents here and our economy (so dependent on the clean environment).</p>	Thank you for your comment.
Ch07-037	Val Veirs	<p>As an active member of the San Juan County Land Bank and also the San Juan Preservation Trust, I have devoted many hours to conservation and preservation projects involving both organizations. I have also helped my husband and son develop a hydrophone system to listen to the underwater sounds of the Salish Sea. It is very important to me to preserve and nurture the exceptionally diverse and beautiful environment in which I live, and I do not think that Tesoro's Clean Products Upgrade Project fits with my environmental ethics. Unfortunately, it is not fostering good health of our island's citizenry, our endangered orcas and salmon, and the overall marine environment of the Salish Sea.</p>	Thank you for your comment.
Ch07-038	Dianna MacLeod	<p>All actions taken with regard to this project must preserve and protect as their first priority the environment and health of marine life at the site and in the region. Anything that compromises, degrades, or risks the environment, whether in this individual project or as part of a larger plan, must be modified or rejected.</p>	Thank you for your comment.
Ch07-039	Gay Wilmerding	<p>Washington State has invested in shellfish and salmon recovery in the Salish Sea, which might be threatened if spills occur.</p>	Thank you for your comment.
Ch07-040	Joe Bucek	<p>A better review should also be required on possible effects of xylene exposure on marine birds and wildlife, forage fish and eelgrass in Padilla Bay, the protected National Estuarine Reserve adjacent to the refinery. It is my opinion the EIS falls short in this area.</p>	Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS.

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Ch07-041	Liz Campbell	This proposed expansion project threatens gravely our Salish Sea and its already endangered Orca Whales.	Thank you for your comment.
Ch07-042	Howard Cherrington	The threats that this project poses to all species in and around Puget Sound and the entire Salish Sea, our climate, fishermen and the surrounding community make it clear that this project should not be permitted as proposed.	Thank you for your comment.
Ch07-043	Charis Weathers	Puget Sound is already under strain for the life that lives in the water. Expanding Tesoro will only create further risk for the extremely delicate ecosystem. Even if safety measures are put in place, there is no guarantee that safety measures will not fail, with create catastrophic consequences. We don't have any "do-overs" with the Salish Sea.	Thank you for your comment.
Ch07-044	Margot Richardson	This is too risky; please protect our waters.	Thank you for your comment.
Ch07-045	Cynthia Jatul	The Salish Sea is already suffering from PCB and other toxic pollutants, and the ecosystem has been destabilized. Our communities depend on a healthy Salish Sea and should not have to suffer further threats from the shipment of more hazardous substances.	Thank you for your comment.
Ch07-046	Mary McCulloch	I live in the Salish Sea, on Orcas Island, and I know how fragile our marine environment is today. Any level of contamination to this area would bring disastrous result to the Flora and Fauna of this pristine area.	Thank you for your comment.
Ch07-047	Teresa Van Haalen	Please protect our Salish Sea from expanded exports through the sea.	Thank you for your comment.
Ch07-048	Sierra Nelson	Toxic and polluting chemicals in Anacortes, in either air or water, not only affect the important port of Anacortes but also the connected San Juan Islands. Endangering fragile marine life, resident orca populations, not to mention the many people who live and work in Anacortes and the San Juans, as well as the	Thank you for your comment.

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		booming tourist industry this area attracts, is not worth it.	
Ch07-049	Andronetta Douglass	Consider and publish the effects on salmon and orcas of this project	<p>Potential impacts on marine wildlife, including Southern Resident killer whales and salmon, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operation – Section 7.4.2 • During a spill – Section 7.4.3 • Cumulative impacts – Section 7.7 <p>Additional information regarding agencies responsible for regulating marine and nearshore resources is provided in Table 2 in Section 3.1 of this Final EIS. Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-050	Cynthia Kaul	I am extremely concerned for the fish and marine mammals, as well as potential accidents, and believe it is time for our counties and state to put life quality before monetary "progress", and invest in sustainable production and economy!	Thank you for your comment.
Ch07-051	Signature illegible, Gretchen Allison, Pam Coffey, Liza Michaelson, Lisa Nash Lawrence, Eric Ray, Daniel Tucker, Shann Westa	INCREASE IN VESSEL TRAFFIC = INCREASE IN NOISE = INCREASE IN THE Threats to our ALREADY ENDANGERED ICONS!! The ORCA + SALMON	Thank you for your comment.
Ch07-052	Francesco Tortorici	As a citizen of the North Olympic Peninsula, I am terribly concerned about this latest proposed assault to our environment and lives. ...Do not allow he corporate/financial pressures contribute to the destruction of the Salish Sea that belongs to all of us.	Thank you for your comment.
Ch07-053	Kenneth Crawbuck	The indian population used to consider the shellfish a staple of their diet and now it is toxically polluted. Why are we so interested in "frying the planet" for profits? Why do we not care about the	Thank you for your comment.

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		salmon, shellfish, eelgrass and orca populations who will suffer from increased risks?	
Ch07-054	Susan Pierson	What do you want your legacy to Skagit County be? That you were the ones that allowed the potential to damage long term the already endangered animals of the Salish Sea? These animals and other animals plus the very Salish Sea itself is part of the amazing heritage of Skagit County, of Washington State and the earth.	Thank you for your comment.
Ch07-055	Marguerite Rietz	we've seen the degradation of the water and air. And the harm being done to sea life. Please keep in mind the need to preserve the health of our ecosystem for our children and grandchildren. This should never be sacrificed for short term gain	Thank you for your comment.
Ch07-056	Kenneth Gibson	The waterways that link Washington, Oregon and California to the Pacific should not be subjected to a growing role as mere conduits for oil. We should not put the aquatic environment at risk for the purpose of adding to the damage done to the atmosphere transporting, refining and burning oil and its derivatives. The world does not need more oil.	Thank you for your comment.
Ch07-057	Lisa ODonnell	Please protect the Salish Sea, the Padilla Bay Estuarine Research Reserve and its eel grass beds and birds, and the Southern Resident Orca Whales who are threatened by this ill-conceived project.	Thank you for your comment.
Ch07-058	Bela Fidel	I am writing about the Tesoro Refinery's expansion project which is hazardous both to the environment and the oceans' wildlife.	Thank you for your comment.
Ch07-059	Carol Wise	Vulnerable waterways must be protected, especially when endangered species are involved.	Thank you for your comment.
Ch07-060	Susan Wilkie	please save our coastal areas and wildlife.	Thank you for your comment.
Ch07-061	R Taylor	we're asking that you must, with fail, protect the endangered salmon and the southern resident orcas by denying Tesoro refinery their greedy expansion of its filthy and polluting inhumane toxic	Thank you for your comment.

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		petrochemicals. Please do right by humankind, the Environment, and the endangered creatures of the Ocean.	
Ch07-062	Tania Malven	HELL NO!!!!!!!!!!!!!! SAVE THE SALISH SEA AND ITS OCCUPANT!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!	Thank you for your comment.
Ch07-063	Lily Johnson	Orcas and salmon are only two species that will become endangered.	Thank you for your comment.
Ch07-064	Gina Bates	PROTECT ORCAS, SALMON & OTHER SEA LIFE FROM TOXIC PETROCHEMICALS!	Thank you for your comment.
Ch07-065	Tim Dustrude	This could be the final nail in the coffin for Southern Resident Killer Whales and local Salmon populations.	Thank you for your comment.
Ch07-066	Pam Madison	It is unsafe and a huge threat to this special place in the Northwest. Being a petrochemical highway is not right. This is too close to cities and sea life that is the heart of life and commerce in the Northwest a home I have loved for 45 years.	Thank you for your comment.
Ch07-067	Laura Ackerman	The Salish Sea and its creatures belong to all Washingtonians.	Thank you for your comment.
Ch07-068	Grace Dunbar-Miller	I am incredibly passionate about maintaining a healthy environment for the inhabitants of the Salish Sea.	Thank you for your comment.
Ch07-069	Jen Fujii	Orcas and other indigenous marine species are critical to our ecosystem in the Salish sea. We need to view each project with the goal of the highest standards of conservation. Additionally these animals are our own canary in the mine, as their health is linked to our health.	Thank you for your comment.
Ch07-070	Helen Findley	We need to protect endangered salmon and southern resident orcas as well as our people using the seas and land.	Thank you for your comment.
Ch07-071	Sheila Miller	The orca whales and other marine life must be protected.	Thank you for your comment.

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Ch07-072	Lisa Mateas	There is nothing more important than the continued safety of the environment and the animals within it, especially in an area as precious and important as Skagit County and the Salish Sea.	Thank you for your comment.
Ch07-073	Ray Mallaber	personaly care about the health and safety of our waterways. We need to protect our natural recourceces. That is not even mentioning its inhabitants.s	Thank you for your comment.
Ch07-074	David Robison, David Robison	As you know, the Puget Dound and greater Salish Sea are under great threat already and need further protection and mitigation— not further assaults. Please keep xylene away from our salmon and orcas.	Thank you for your comment.
Ch07-075	Elsie Wattson Lamb	Xylene is nasty. There is already a large xylene production going on in Singapore, to which we should not add but most particularly should not be running any of this production and transportation in and around the Salish Sea, which is already in a precarious and declining state of health (witness the few remaining orcas we have, the starfish die-off, etc). Everything that impinges on the health of the sea is foolish to undertake and short-sighted.	Thank you for your comment.
Ch07-076	Sue O'Donnell	I am now reading a very interesting book called The Death and Life of the Great Lakes by Dan Egan. This 2017 book chronicles the decline of a great ecosystem as man-made canals and seaways have allowed ships to contaminate the fresh lake waters with foreign sea creatures hitching rides on the hulls and in the ballast water. This reminded me of a letter I sent to a writer for the Skagit Valley Herald, Kimberly Cauvel. She had written a story about the invasive green crab showing up in local waters. Here is what I wrote to her: "Hi Kim, Really enjoyed your report on the invasion of the green crabs. Here's something I've often wondered about. These huge oil tankers travel in & out of our waters from all points. The refineries in Anacortes are visible from my house. Just this morning and continuing for a long time into the afternoon, one of the tankers - tied up at a refinery dock - was spewing a long stream	Potential impacts from invasive marine or estuarine species are discussed in Section 7.4.2.5 of the Draft EIS. Additional information regarding agencies responsible for regulating marine and nearshore resources is provided in Table 2 in Section 3.1 of this Final EIS.

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		<p>of water(?) from the side of the ship. What was that? Dirty water from the last place they had been? Who knows what was in that water(?)? Eggs of invasive species? Seaweed seeds from another ecosystem? Green crabs????</p> <p>Who is supposed to monitor what happens in all the bays surrounding our fragile & precious islands?"</p> <p>So, what is a citizen supposed to do? Call the Coast guard? Call the EPA? Call the refineries??</p> <p>I did not get a response from the news writer. 251767</p>	
Ch07-077	Eileen Smoke	<p>I am a resident of Mount Vernon,, and have an interest in the whales. We go 6-7 times every year looking for the beautiful whale that live in this ecosystem. A professional naturalist who is educated in ecological systems of this area and the whole planet has helped me gain knowledge of the area. I feel that the health of the ecosystem is foundational to the health of human and to their long term economic well being, too. This proposal benefits a select few in corporate interest, the rich, and is a high risk for everyone, human and nonhuman.</p>	Thank you for your comment.
Ch07-078	Louise Locke	<p>No! No! No! It is not worth the risk to the community of humans and wild creatures that live in the Salish Sea.</p>	Thank you for your comment.
Ch07-079	Louise Locke	<p>it is not worth the risk of harming our whales, our fish, our circle of life in the Salish Sea and the extreme danger to workers and community. No no no; please do not expand or build this construction. Thank you.</p>	Thank you for your comment.
Ch07-080	Mary Sinker	<p>Fidalgo Bay and Padilla Bay are both marine ecosystems of high value for birds, mammals, and other wildlife.</p>	Thank you for your comment.
Ch07-081	Lorraine Hartmann	<p>Please don't build the xylene plant. Our Salish Sea is too precious to risk with this sort of production there.</p>	Thank you for your comment.
Ch07-082	Karen Moskowitz	<p>We are already losing Orca populations and loss of salmon. This impact would be too great.</p>	Thank you for your comment.

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Ch07-083	Lin Meadow	NO! NO! NO! And HELL NO! The Salish Sea and its inhabitants are suffering enough already.	Thank you for your comment.
Ch07-084	Bruce Becker	Please do not further undermine the condition of the Salish Sea by allowing the Tesoro xylene plant and oil trains to further damage the sensitive marine environment there. As a resident of Stuart Island, I am aware to the daily, routine degradation of the ecosystem, threatening the livelihood of the orcas, salmon, eagles.	<p>The proposed project does not include transport of crude oil to or from the Tesoro Refinery. See Chapter 2 for the project description. Potential environmental impacts associated with transport of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The potential impacts on the marine environment, wildlife, and marine life resulting from the proposed project are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Designated or permitted land and shoreline use – Section 10.3.2 • Terrestrial wildlife and marine birds – Section 6.4.3 • Southern Resident killer whales and marine wildlife – Section 7.4.2 <p>Measures that would be taken to protect marine life and water quality are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Wildlife and marine life – Section 6.4 and Section 7.4 • Water quality – Chapter 5 and Section 7.4 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding marine and nearshore resources is provided in Section 3.5 of this Final EIS.</p>
Ch07-085	Lucinda Stroud	I'm deeply concerned about the proposal for the creation of the Tesoro refinery and the impact that I would have on the Salish Sea especially given the dangers of xylene as a flammable	The proposed project involves additions and upgrades to the existing refinery that would enable Tesoro to produce lower sulfur transportation fuels and to produce mixed xylenes. Xylenes are flammable and have a similar flammability to gasoline (see

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		petrochemical.	<p>Section 9.6.1 of the Draft EIS). Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as described in Sections 6.4.3.3, 7.4.3.2, 9.6.2.1, and 13.5.2 of the Draft EIS.</p> <p>The potential impacts to the Salish Sea resulting from the proposed project, particularly the flammability of xylene, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality – Sections 4.4.3 and 4.4.4 • Marine birds – Sections 6.4.2 and 6.4.3 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2 • Aesthetics and views – Section 10.5.2 • Treaty and traditionally used resources – Section 11.5.2.3 • Cultural resources – Section 12.4.2 • Vessel traffic – Section 13.3.2 • Vessel safety – Section 13.4.2 • Vessel spills – Section 13.5 <p>Additional information regarding potential impacts to marine and nearshore resources in the Salish Sea is provided in Section 3.5 of this Final EIS.</p>
Ch07-086	Phyllis Dolph	<p>The negative health impacts of xylene, not only on humans but also on marine animals, such as whales and harbor seals should be enough to shut down the project. Our Orcas are already endangered, so to add another danger just does not make sense. What will happen to the salmon that whales depend upon for food if there is an oil spill?</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S. Coast Guard, Washington State Department of Ecology, and U.S. Environmental Protection Agency. Additional information regarding agencies responsible for regulating marine transportation is provided in Table 2 in Section 3.1 of this Final</p>

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			<p>EIS.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>If a spill were to occur, the potential impacts on human health, fish, birds, mammals, and other wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine species, including whales/Southern Resident killer whales, harbor seals, and fish (salmon) – Section 7.4.3 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Human health – Sections 9.3.2, 9.5.2, and 9.6.2 <p>Additional information regarding potential impacts to marine and nearshore resources, including aquatic life, in the event of a marine spill is provided in Section 3.5 of this Final EIS.</p>
Ch07-087	Maria Magana	Allowing this project will put the Salish Sea at risk with the transport of a flammable substance.	Thank you for your comment.
Ch07-088	Edward John McLeod	The Pacific Northwest and Puget Sound (the Salish Sea) are one of the few remaining environments that have eluded a major toxic spill disaster so far. Further south into Puget Sound human occupation and corporate disregard have caused serious and consequential damage to the marine environment that, while being recognized, isn't being adequately addressed or remedied. Sadly, this level of human disinterest and disregard is driving our	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft</p>

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		little planet toward unsustainability and peril.	<p>EIS. Cumulative impacts from marine transportation, including vessel traffic, vessel safety, and spill risks, are discussed in Section 13.6 of the Draft EIS.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill likelihood and the potential for increased vessel traffic to increase spill risks – Section 13.5.6 and Section 13.6 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>If a spill were to occur, the potential impacts on fish, birds, mammals, and other wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine and nearshore resources – Section 7.4.3 <p>Additional information regarding potential impacts to marine and nearshore resources, including aquatic life, in the event of a marine spill is provided in Section 3.5 of this Final EIS.</p>
Ch07-089	Phyllis Dolph	I am aware that the DEIS studied the potential impacts to plants and animals. However, I think it inadequate, for invasive species can be introduced by construction, oil can be spilled on the water and the land, diesel fumes can affect flora and fauna with cumulative impacts. Even noise can be stressful to organisms living there.	<p>The Draft EIS analyzed the potential impacts from invasive species, spills to water and land, air quality, and noise.</p> <p>Potential impacts on plants and animals from the introduction of invasive species are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial vegetation and wildlife – Section 6.4

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			<ul style="list-style-type: none"> • Marine and nearshore resources – Section 7.4.2 <p>Cumulative impacts on terrestrial wildlife and marine life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.6 • Marine species, including whales/Southern Resident killer whale, harbor seals, and fish (salmon) – Section 7.7 <p>The toxicity of xylene (and reformate) to terrestrial and marine wildlife is discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3 • Marine species, including whales/Southern Resident killer whale, harbor seals, and fish (salmon) – Section 7.4.3 <p>Potential impacts to terrestrial and marine wildlife as a result of noise from the proposed project are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Sections 6.4.1.4 and 7.4.1.5 • Noise during operations – Sections 6.4.2 and 7.4.2.6 <p>Additional information regarding potential air impacts (including from diesel fumes), terrestrial plants and wildlife (flora and fauna), marine and nearshore resources, environmental health, and marine transportation is provided in Chapter 3 of this Final EIS.</p>
Ch07-090	Martha Hall	<p>Orcas and salmon are symbols of the Salish Sea. Both are cherished, and both are listed as "endangered". Perhaps this is because the health of the Salish Sea is also threatened. Yet many of our communities are like Anacortes, they are defined by being on the Salish Sea. It is time for us to remember this as we look at yet another plan that may negatively impact our inland sea.</p>	<p>Potential impacts on marine wildlife, including Southern Resident killer whales and salmon, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operation – Section 7.4.2 • During a spill – Section 7.4.3 • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Marine life – Section 7.4, Sections 2.7.6 and 2.8.5, Appendix 2-A

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			<ul style="list-style-type: none"> Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 <p>Additional information regarding Southern Resident killer whales (including NOAA’s <i>Recovery Plan for Southern Resident Killer Whales [Orcinus orca]</i> published by NMFS in 2008) and the toxicity of xylenes to aquatic life is provided in Section 3.5 of this Final EIS. Additional information regarding agencies responsible for regulating the protection of marine species listed under the Endangered Species Act is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-091	Veronica Bush	It is my understanding that the environmental impacts of Tesoro Anacortes Xylene Proposal would put orca whales at greater risk. Already the southern resident orca whales are endangered.	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Marine resources–Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A Water quality–Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A Vessel safety and waterway management–Section 13.4.1.2 Compliance with the Endangered Species Act and the Marine Mammal Protection Act–Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-092	Veronica Bush	If not this, I ask that no plans go through without heavy regulations for safety and more heavily influenced mitigation that would contribute to the southern orca whales environment, including routes that would help them live properly without risk, protected areas that would not affect them, and money given to research and plant/tree growing in the area and along the coast	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Marine resources–Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A Water quality–Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A Vessel safety and waterway management–Section 13.4.1.2 Compliance with the Endangered Species Act and the Marine

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			<p>Mammal Protection Act–Section 7.3.3.10</p> <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-093	Peggy Printz	<p>If it [the project] happens anyway:</p> <p>Spill risk and orca impacts must be mitigated by, at a minimum, reduced speeds and tug escorts</p>	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine resources–Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Water quality–Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Vessel safety and waterway management–Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act–Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-094	Gayle Janzen	<p>To make this even worse is the fact that they will be exporting 15,000 barrels a day to Asia! Talk about a disastrous accident waiting to happen since that would bring an additional FIVE tankers per month through the Salish Sea where our beleaguered orcas are fighting to survive. Allowing more tankers through their home carrying this toxic chemical would be the nail in their coffin should a tanker have an accident.</p>	<p>The proposed project would enable Tesoro to produce an average of 15,000 bpd of mixed xylenes (see Section 2.1 and 2.8 of the Draft EIS). The mixed xylenes would be stored in storage tanks in the New Tanks Area and shipped (exported) approximately two times per month by marine vessel via the existing wharf structure. There are also three additional vessels per month that would deliver reformat to the refinery – a petroleum feedstock used for both gasoline and xylenes production.</p> <p>The likelihood and potential impacts associated with a marine</p>

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			<p>spill are discussed Section 13.5 of the Draft EIS. Cumulative impacts from marine transportation including vessel traffic, vessel safety, and spill risks are discussed in Section 13.6.</p> <p>Potential impacts to Southern Resident killer whales as a result of more tankers and in the event a tanker has an incident are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Potential impact on Southern Resident killer whales from increased marine tanker traffic – Section 7.4.2 • Potential impact on Southern Resident killer whales from marine spills – Section 7.4.3 • Vessel safety and waterway management – Section 13.4.1.2 • Spill likelihood and potential for increases in vessel traffic to increase spill risk – Section 13.5.6 and 13.6 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Southern Resident killer whales and their designated habitat within U.S. waters are protected under the Endangered Species Act and the Marine Mammal Protection Act under shared jurisdiction by the U.S. Fish and Wildlife Service and National Marine Fisheries Service (see Sections 7.1 and 7.3.3.10 of the Draft EIS).</p> <p>Additional information regarding agencies responsible for regulating vessel traffic and for protecting Southern Resident killer whales is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts to Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding marine transportation, including spill modeling, likelihood, and response, is provided in Section 3.9 of this Final EIS.</p>
Ch07-095	Janet Alderton	Marine mammals, including the Endangered Southern Resident Killer Whales, will be adversely impacted by the increased vessel traffic. Increasing underwater noise from vessels has a significant impact on the feeding and social interactions of Endangered Southern Resident Killer Whales. Noise Impacts to Endangered Southern Resident Killer Whales From A key to quieter seas: half of	<p>Potential impacts to Southern Resident killer whales from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During operations – Section 7.4.2 • During construction – Section 7.4.1

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		<p>ship noise comes from 15% of the fleet Veirs et al 2017, attached .pdf. "...ship noise has been identified by regulatory agencies in Canada and the U.S. as a chronic, habitat-level stressor threatening the recovery of the endangered killer whale population in this region (Williams 2016)." Rob Williams, Len Thomas, Erin Ashe, Clark Christopher W, Philip S Hammond. Gauging allowable harm limits to cumulative, sublethal effects of human activities on wildlife: A case study approach using two whale populations. Marine Policy 70, 5864 (2016). Link (http://dx.doi.org/10.1016/j.marpol.2016.04.023) R Williams, A J Wright, E Ashe, L K Blight, R Bruintjes, R Canessa, C W Clark, S CullisSuzuki, D T Dakin, C Erbe, P S Hammond, N D Merchant, P D O'Hara, J Purser, A N Radford, S D Simpson, L Thomas, M A Wale. Impacts of anthropogenic noise on marine life: Publication patterns, new discoveries, and future directions in research and management. Ocean & coastal management 115, 1724 (2015). Link (http://dx.doi.org/10.1016/j.ocecoaman.2015.05.021) Rob Williams, Christine Erbe, Erin Ashe, Beerman Amber, Jodi Smith. Severity of killer whale behavioral responses to ship noise: A dose-response study. Marine pollution bulletin 79, 254260 (2014). Link (http://dx.doi.org/10.1016/j.marpolbul.2013.12.004) Rob Williams, Christine Erbe, Erin Ashe, Beerman Amber, Jodi Smith. Severity of killer whale behavioral responses to ship noise: A dose-response study. Marine pollution bulletin 79, 254260 (2014). Link (http://dx.doi.org/10.1016/j.marpolbul.2013.12.004) All vessels transporting reformat feedstock and mixed xylenes product should conform to vessel noise standards cited in this publication, namely "Quiet gross polluters (to below a 175.4 dB threshold)".</p>	<p>Measures that are being taken to protect marine mammals, including Southern Resident killer whales, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 <p>Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The sources listed in the comment state similar conclusions about the difficulty to directly correlate impacts of anthropogenic noise to impacts on Southern Resident killer whales and other marine organisms.</p> <p>The publication referencing the "Quiet gross polluters (to below a 175.4 dB threshold)" statement in the link has been reviewed. This publication does not provide information related to a vessel's underwater sound thresholds for Quiet Gross Polluters (<175.4 dB). The vessel noise standard stated in the comment does not include an acoustic metric associated with it (e.g., roots mean squared sound pressure level [RMS SPL] or cumulative sound exposure level [cSEL]) and it does not include a reference value (for example cSEL has a reference value of 1micropascalsquared second [$\mu\text{Pa}^2\text{s}$]); therefore, the standard as it is written, is not useful for assessing potential impacts on endangered Southern Resident killer whales.</p> <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>

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Ch07-096	David Robison	The resident and itinerant orca population of the Salish Sea (Puget Sound, Strait of Juan de Fuca, and Strait of Georgia) are already under great threat from many sources. The potential for a chemical or crude spill is too great a risk for them and the other parts of the ecosystem.	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The likelihood and potential impacts associated with a marine spill and toxic releases are discussed in Section 13.5 of the Draft EIS. Cumulative impacts from marine transportation, including potential impacts on vessel traffic, safety, and spill risks, are discussed in Section 13.6.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>If a spill were to occur, the potential impacts on marine mammals and other wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, and waterfowl) – Section 6.5 • Marine species, including whales/Southern Resident killer whales, harbor seals, and fish (salmon) – Section 7.4.3 <p>Additional information regarding potential impacts of the proposed project on marine and nearshore resources in the event of a marine spill is provided in Section 3.5 of this Final EIS.</p>
Ch07-097	Janet Hedgepath	Orca populations are shrinking. More traffic through their areas exacerbate that trend.	Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of whales

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			<p>within 5 miles of the marine vessels.</p> <p>Potential impacts to Southern Resident killer whales as a result of increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operations – Section 7.4.2 • Cumulative impacts – Section 7.7 <p>Measures that would be taken to protect marine life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 <p>Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-098	Phyllis Dolph	The Tesoro Anacortes Refinery has proposed a project to produce and export xylenes--a toxic, flammable oil product. This expansion will mean more tanker traffic through sensitive marine habitat...	<p>Xylenes are flammable and have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS). Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as described in Sections 6.4.3.3, 7.4.3.2, 9.6.2.1, and 13.5.2 of the Draft EIS.</p> <p>The Draft EIS analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3. The potential impacts on marine habitats and wildlife resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine birds – Sections 6.4.2 and 6.4.3 • Special status terrestrial species – Section 6.5 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2

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			<ul style="list-style-type: none"> • Aesthetics and views – Section 10.5.2
Ch07-099	Phyllis Dolph	The final EIS should include ... health effects of increased ocean noise.	<p>Noise impacts were analyzed for human health, wildlife, and marine life. The increased ocean noise due to the proposed project’s vessel traffic was analyzed. Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of whales within 5 miles of the marine vessels. However, due to the short duration of disturbance, proposed project marine vessel operation is unlikely to impact behavior of marine wildlife to an extent that would reduce the viability of a population of a marine wildlife species.</p> <p>Potential impacts to Southern Resident killer whales as a result of noise from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1.5 • During operations – Section 7.4.2.6 <p>Measures that would be taken to protect marine life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, and other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 <p>Additional information regarding noise impacts to marine life is provided in Section 3.5 of this Final EIS.</p>
Ch07-100	Phyllis Dolph	We already have tankers and ships whose noise is disrupting the whales’ sonar. They cannot communicate as they should. They cannot catch salmon, upon which their lives depend. When some sounds have become too strong, some whales have died.	<p>Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of whales within 5 miles of the marine vessels. However, due to the short duration of disturbance, proposed project marine vessel operation is unlikely to impact behavior of marine wildlife to an extent that would reduce the viability of a population of a marine wildlife species.</p> <p>Potential impacts to Southern Resident killer whales as a result of</p>

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			<p>noise from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1.5 • During operations – Section 7.4.2.6 <p>Measures that would be taken to protect marine life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 <p>Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-101	Jacob Pederson	<p>Furthermore regarding the proposed routes, your EIS should include an alternative specifying that the route should avoid the area around the San Juan Islands where the dwindling, and endangered resident Orca Population lives to both avoid spills there and to cut down on the accustic interference. The tankers will not be as big as some if used, however, studies show that the size of the ship is not a leading factor in whether or not they will harm whales, or, in this case, a members of the dolphin family. The bottom line is that this particular proposed tanker could cause a lot of damage to the Orca Pod if 5 a month go through their waters.</p>	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3. The marine vessel transportation route would follow the established existing route regulated by the U.S. Coast Guard VTS or the Canadian Coast Guard. Additional information for alternative marine vessel transportation routes is discussed in Section 2.9.3 of the Draft EIS. Additional information regarding agencies responsible for regulating marine vessel transits is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types and vessel traffic is provided in Section 3.9.1 of this Final EIS.</p> <p>The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project’s construction and operation phases (Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are also analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that would be taken to protect marine wildlife are</p>

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			<p>discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch07-102	LeeAnn Chastain	<p>Large and small marine mammals need to be able to safely pass through our waters for vital feeding sources and during normal migration routes. Increasing the underwater noise, which disrupts marine mammal communication, and increasing the chance of collision with SUV vessels is far too risky.</p>	<p>Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of whales within 5 miles of the marine vessels. However, due to the short duration of disturbance, proposed project marine vessel operation is unlikely to impact behavior of marine wildlife to an extent that would reduce the viability of a population of a marine wildlife species.</p> <p>Potential impacts to marine mammals as a result of noise from increased vessel traffic and potential vessel strikes are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6 • Marine vessel strikes during construction – Section 7.4.1.2 • Marine vessel strikes during operations – Section 7.4.2.2 <p>Measures that would be taken to protect marine life, including marine mammals, are discussed in the following sections of the</p>

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			<p>Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 <p>Additional information regarding potential impacts of the proposed project on marine and nearshore resources is provided in Section 3.5 of this Final EIS.</p>
Ch07-103	Teresa Dix	I also wonder about the impacts that increased boat traffic and the noise of these ships, what will this noise do that will harm the whales?	<p>The Draft EIS analyzes potential noise impacts on orca whales related to increased vessel traffic during the proposed project’s construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessel transport in the Salish Sea and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>

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Ch07-104	Wendy Courtemanche	<p>My primary concern continues to be potential harm to our Salish Sea marine environment and marine life, including the resident orca population.</p>	<p>Thank you for your comment.</p>
Ch07-105	Phyllis Dolph	<p>The Xylene Project would send its products on large tankers to Asia through our highly sensitive marine habitat, world renowned for its Orcas and for its beauty. Dr. Scott Veirs, of Beam Reach Marine Science, after years of research on the effect of ocean noise pollution, has provided a stark picture of the effect of threshold levels of acoustic noise from ships on our Orcas, and other marine mammals, fish, diving birds, and invertebrates. The resident Orca population has dropped this year to 78 animals in three pods, the lowest number in more than a decade.</p> <p>At least one ship is present right now about 40 per cent of the time in the Salish Sea. Each ship reduces the range that whales can communicate by a whopping 68 per cent! Ship noise interferes with the Orca's ability to catch salmon, and therefore, threatens their very survival.</p> <p>With adding 60 more tankers per year to pleasure boats, the proposed addition of 34 additional tankers PER MONTH (408 per year) as part of the Kinder Morgan expansion, the whale-watching industry, ferry boats, and oil tankers already there, it is likely that our Orcas will gradually become extinct over time.</p> <p>The DEIS does not adequately address the noise produced by the crowding of boat traffic nor the marring of Salish Sea's beauty.</p>	<p>In the U.S., the most recent guideline (Technical Guidance) for assessing the effects of anthropogenic sound on marine mammal hearing was published by the NMFS in July 2016 (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Technical Guidance includes a summary of PTS onset acoustic thresholds for five marine mammal hearing groups (low frequency cetaceans, medium frequency cetaceans, high frequency cetaceans, phocid pinnipeds [underwater], and otariid pinnipeds [underwater]). Orca whales are grouped under MF cetaceans and the acoustic threshold of MF cetaceans is 198 dB cSEL for non-impulsive sources such as large marine vessels. This threshold applies to marine mammal hearing sensitivity (injury thresholds) and does not apply to behavioral responses that affect feeding and social interactions.</p> <p>The Draft EIS discusses the increase in vessel traffic as a result of the proposed project in Section 13.3. Additional information regarding the vessel traffic analysis for the proposed project is provided in Section 3.9 of this Final EIS. Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of pinnipeds and whales within 5 miles of the marine vessels. However, the Southern Resident Killer whales spend the majority of their time on the west side of San Juan Island and not in the marine vessel transportation route to the south.</p> <p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13 of the Draft EIS. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects, including the Kinder Morgan Trans Mountain</p>

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			<p>Pipeline Expansion project, and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Marine resources potentially impacted by the proposed project in combination with these foreseeable future projects and actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine and nearshore resources (including impacts on Southern Resident killer whales) – Section 7.7 • Land and shoreline use and visual resources – Section 10.6 • Marine transportation – Section 13.6 <p>The potential impacts on sensitive marine areas, marine birds, marine life, and invertebrates resulting from the proposed project are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Southern Resident killer whales, marine life, invertebrates and nearshore resources–Section 7.4 • Marine birds–Section 6.4 • Designated or permitted land and shoreline use–Section 10.3.2 • Aesthetics and views–Section 10.5.2 <p>Measures that are being taken to protect the sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine resources–Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Water quality–Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Vessel safety and waterway management–Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act–Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer</p>

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			whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding vessel types and vessel traffic is provided in Section 3.9.1 of this Final EIS.
Ch07-106	Steven Elliser	My wife is Dr. Cindy Elliser, and she will talk to you at length about the mammals around here and the potential impact to them from this project. And, in our opinion, it's negligible and certainly something that we can mitigate. The good folks at Tesoro, that I do work with -- I volunteered for our spill drills and do some computer work and analysis on those. Those folks would be happy to talk to anyone to explain what can be done to mitigate all these factors.	Thank you for your comment.
Ch07-107	Phyllis Dolph	The xylene project would send its products on large tankers through Asia, through our highly sensitive marine habitat, world renowned for its orcas and for its beauty. Dr. Scott Veirs of Beam Reach Marine Science, after years of research on the effect of ocean noise pollution, has provided a stark picture of the effect of threshold levels of acoustic noise from ships on our orcas plus other marine mammals, fish, diving birds, and invertebrates. The resident orca population has dropped this year to 78 and three pods, the lowest number in more than a decade. At least one ship is present today about 40 percent of the time in the Salish Sea. Each ship reduces the range that whales can communicate by a whopping 68 percent. Ship noise interferes with the orcas' ability to catch salmon and therefore threatens their very survival.	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>The Draft EIS discusses the potential impacts on marine mammals, including Southern Resident killer whales, and other marine resources resulting from increased marine vessel traffic through the Salish Sea in Sections 7.4.2 and 7.4.3. Cumulative impacts on Southern Resident killer whales and other marine resources from increased vessel traffic are discussed in Section 7.7 of the Draft EIS. The Draft EIS analyzes potential noise impacts on orca whales related to increased vessel traffic during the proposed project's construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement

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			<p>for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2</p> <ul style="list-style-type: none"> • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-108	Level Pratt	<p>I want to speak tonight on behalf of the southern resident killer whales. The vessels would, in addition to increasing the risk of oil spills and accidents, increase vessel noise and the federally enlisted as endangered southern resident killer whale critical habitat. Vessel noise to these orca whales is not successfully addressed in the DEIS. No one has declared southern resident killer whales as one of only eight spotlight species -- out of 1,652 -- on the endangered species list. Spotlight species are considered most at risk of extinction, unless immediate action is taken to stabilize and recover their population. The DEIS states in Chapter 7 that the, quote, increase of five marine vessels per month is equivalent to 0.1 to 2.2 percent increase in marine vessel traffic along these transportation routes, which would not be considered a significant increase in marine vessel traffic over current levels, unquote. However, a recent study clearly shows the number of additional vessels associated with the proposed project as a percentage increase does not have any correlation with the proposed project vessel traffic noise impacts to southern resident killer whales and other marine species. The study concludes that half of the ship noise comes from 15 percent of the fleet. Require the Final Environmental Impact Statement to consult with NOAA in order to fully address the proposed project's vessel noise impacts to the state and federally listed as endangered southern resident killer whales. The project-related vessels will transport reformate from other West Coast refineries. Require the FEIS to include in the assessment of both vessel noise and oil spill impacts to orca</p>	<p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016).</p> <p>The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project's construction and operation phases (Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes</p>

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		<p>whales, the entire southern resident killer whale range along the outer coast of British Columbia, California, Oregon, and Washington State; and if the project is approved, require all vessels associated with the project to be accredited as quiet by ship classification societies.</p>	<p>cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are also analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>The EIS does not attempt to analyze potential impacts from project-related marine vessel transport along the outer coast. Marine vessels along the outer coast would follow established shipping lanes and would be required to follow applicable regulations. The number of vessels would consist of up to 5 vessels per month across a much larger area than within the study area.</p> <p>Additional information regarding agencies responsible for regulating marine vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The vessels would be inspected by the USCG and would be required to meet applicable USCG and Washington State</p>

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			<p>requirements. The “Silent Class Notation” given by a vessel Classification Society is a special certification that is normally applied to newer vessels or those vessels with specialty missions; oceanographic research vessels; fishing trawlers (assists the vessel to use fish finding sonar more accurately); smaller cruise ships in sensitive environments, and tour boats that are used to approach large marine mammals and sensitive wildlife and are trying to be less intrusive from an acoustic perspective to the environment); seismic research vessels; and vessels that would regularly be transiting sensitive marine areas. To require vessels associated with the proposed project to do this along the shipping channel would make a negligible reduction in the acoustic impact on the environment.</p>
Ch07-109	Bob Hall	<p>3. Continuing research is showing the negative impacts of sound on orcas. This was not adequately covered in the DE IS. Since the S. residents are endangered, apparently starving to death, any impact on them must be documented and mitigated.</p>	<p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p> <p><i>NOAA’s Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project’s construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p>

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			<p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Ch07-110	Bryan Potter	<p>In fact, no further comment or analysis is given regarding the impact of increasing marine traffic on local orca and whale populations even after the draft cites Canadian reports which document significant risks of such with any further development and shipping.</p>	<p>Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>The Draft EIS discusses the potential impacts on marine mammals, including Southern Resident killer whales, and other marine resources resulting from increased marine vessel traffic through the Salish Sea in Sections 7.4.2 and 7.4.3. Cumulative impacts on marine mammals and other marine resources from increased vessel traffic are discussed in Section 7.7 of the Draft EIS.</p>
Ch07-111	Martha Hall	<p>5. Impacts of sound from vessels in the Salish Sea. Many new studies are being completed that were not in the EIS concerning the negative impacts of sound on the Southern resident orca population. I found no mitigation for the additional ships in this project. It is time for these. Scientists are exploring some ideas such as slowing ships down so the sound has less impact, or having them grouped so the sound pollution is not continually happening,</p>	<p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS, including</p>

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		day and night.	<p>information from the Southern Resident Killer Whales (<i>Orcinus orca</i>) 5-Year Review: Summary and Evaluation published by the NMFS in December 2016.</p> <p>NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project's construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Marine vessel safety and waterway management are administered by the USCG and Ecology's Office of Marine Safety. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p>
Ch07-112	Martha Hall	Few people know that orcas use to come into Guemes Channel	The critical habitat and normal range of orca whales is discussed

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		and up to the area where the Port of Anacortes has docks today. On Sunday afternoon, people would go down to watch the orcas. The orcas have not come near this area for many years. What happened?	in Section 7.3.3.10 of the Draft EIS. NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on orca whales.
Ch07-113	Anne Miller	And I also think that the final impact assessment should address some of the noise impacts for killer whales. They're endangered right now not just in the region, but along the entire West Coast. Because these vessels will transport all along like B.C., the coast of California, Oregon, and Washington to -- from other West Coast refineries.	<p>The Draft EIS analyzes potential noise impacts on marine mammals related to increased vessel traffic during the proposed project's construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p> <p>The Draft EIS discusses the increase in vessel traffic as a result of the proposed project in Section 13.3. Additional information regarding the vessel traffic analysis for the proposed project is provided in Section 3.9 of this Final EIS. Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of pinnipeds and whales within 5 miles of the marine vessels. However, the Southern Resident killer whales spend the majority of their time on the west side of San Juan Island and not in the marine vessel transportation route to the south.</p> <p>Measures that would be taken to protect marine mammals, including the Southern Resident killer whale, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section</p>

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			3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.
Ch07-114	Chelsea Blank	A few things that I think need more attention are...The potential effects on the whale population and the Salish Sea, along with the economy of whale-watching in this area,	<p>The Draft EIS discusses the potential impacts on whales and other marine resources resulting from increased marine vessel traffic through the Salish Sea in Sections 7.4.2 and 7.4.3. The Draft EIS discusses potential impacts to recreation and wildlife watching as a result of the proposed project in Section 10.4 and the cumulative impacts from increased vessel traffic in Section 10.6.</p> <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-115	Chelsea Blank	Also, I would suggest that the EIS consider the alternatives and require additional permits pertaining to Section 10 of the Rivers and Harbors Act and Marine Mammal Protection Act.	<p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p>
Ch07-116	Bonnie Miller	Our orcas will be impacted.	Thank you for your comment.
Ch07-117	Will Golding	What impacts could this project have on endangered orcas whales that live throughout the area? Would this project compound impacts these whales are already facing from severe habitat	The potential impacts on the marine environment, wildlife, and marine life, including the Southern Resident killer whales, resulting from the proposed project are discussed in Section 7.4.2

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		degradation and increasing ocean acidity?	<p>of the Draft EIS. Cumulative impacts on Southern Resident killer whales and other marine resources are discussed in Section 7.7 of the Draft EIS.</p> <p>Measures that would be taken to protect marine life and water quality are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls to prevent a spill at the refinery – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Wildlife and marine life – Section 6.4 and Section 7.4 • Water quality – Chapter 5 and Section 7.4 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Ocean acidification is primarily due to global CO₂ emissions, but seawater chemistry could be affected by emissions of acid gases such as SO₂.</p> <p>Additional information regarding agencies responsible for regulating emissions, sulfur in fuel, and for protecting Southern Resident killer whales is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding ocean acidification is provided in Section 3.3.5 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-118	Arlene French	My concerns are how any accidents would impact... the fragile waters of Fidalgo Bay and the resident pod of Orca Whales.	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine resources–Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Water quality–Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Vessel safety and waterway management–Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine

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			<p>Mammal Protection Act--Section 7.3.3.10</p> <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-119	Julia Hurd	Then there are the Salish Sea Orcas, declared an endangered species in 2005, and they have not been able to recover and are still declining. This plant adds yet another layer of danger to this iconic animal.	Thank you for your comment.
Ch07-120	Betsy Toll	The proposal presents serious danger to state and federally listed protected species such as the Southern Resident Killer Whales. It does not identify any ways that it would provide required mitigations for all the project's very likely negative impacts -- because, how could it?	Thank you for your comment.
Ch07-121	Kristin Miller	<p>I am writing from Gabriola Island in British Columbia. We are located about 100 miles from Anacortes and share the Salish Sea with Washington state.</p> <p>I am terribly concerned that any expansion of the Tesoro's refinery to process Xylene will have an impact on our Canadian marine animals, which you no doubt know are already threatened.</p> <p>Even if you are prepared to ignore the possible dangers of a xylene spill or explosion, you must consider that the increased volume of shipping generated by the refinery expansion.</p> <p>Ship strikes, acoustic overload, and diminished water quality will stress and threaten orcas, humpback whales, and dolphins in the Salish Sea and Juan de Fuca Strait.</p>	Thank you for your comment.
Ch07-122	Mike Sennett	I object to the Tesoro expansion on the grounds that it will...further disturb the endangered resident orca pod.	Thank you for your comment.

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Ch07-123	Michael Devirian	The increase in vessel traffic also increases noise impacts to our endangered orca whales.	Thank you for your comment.
Ch07-124	Jim lombard	<p>Fourth: The impact on endangered Southern Resident Killer Whales is inadequate.</p> <p>Solution: NOAA should be consulted to fully assess these impacts, including impacts from project vessel noise and spills of all cargos and propulsion fuels. If these impacts cannot be 100% mitigated then the project should be denied.</p>	<p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales.</p> <p>Technical Guidance published by the NMFS was also used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project's construction and operation phases (Section 7.4.1.5 and 7.4.2.6, respectively). Cumulative noise impacts are discussed in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are also analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that are being taken to protect marine life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other

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			<p>measures – Section 13.4.1.2</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel transits, for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act, and for spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Ch07-125	Sara Holahan	ES7.5 Marine Resources The EIS did state the problems that the increased marine vessel traffic would cause to the southern resident Orca population. This should be reason enough to disallow the proposed 60 tanker increase. To save the Orcas, we need to reduce large marine vessels, not allow more.	Thank you for your comment.
Ch07-126	Suzanne Butler	Please consult with NOAA to fully address the impacts to the state and federally listed endangered resident orca whales and identify required mitigations in the FEIS.	<p>Potential impacts to Southern Resident killer whales from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operations – Section 7.4.2 • Cumulative impacts on Southern Resident killer whales and other marine resources – Section 7.7 <p>Measures that are being taken to protect marine mammals, including the Southern Resident killer whale, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a Puget Sound licensed pilot aboard, among other

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			<p>measures – Section 13.4.1.2</p> <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016).</p> <p>Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-127	Nancy Quackenbush	The Final Environmental Impact Statement needs to include a full and comprehensive account of the effect of noise pollution on sea creatures; spill assessment analysis through consultation with NOAA; and the mitigating damaging effects to the extensive existing human, animal and environmental systems.	The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project

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			<p>may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on orca whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016).</p> <p>Additional information regarding agencies responsible for regulating marine vessel traffic, worker health and safety and marine and nearshore worker health and safety, marine vessel transits, air quality, freshwater resources, marine resources, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of noise from the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding spill modeling, spill prevention, and spill response is included in Section 3.9 of this Final EIS.</p> <p>The Draft EIS discusses the potential impacts of increased marine vessel traffic, vessel noise, and marine spills on marine wildlife, including orca whales, in the following sections:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operation – Section 7.4.2 • During a spill – Section 7.4.3 • Cumulative impacts on orca whales and other marine resources – Section 7.7 <p>The Draft EIS discusses the potential impacts of increased noise on human health in Section 9.5.</p>
Ch07-128	Joyce Lewis	Also, a recent study on the increase of whale deaths on the east coast is attributing whale loss to ship collisions. We value our	Thank you for your comment.

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		ocean wildlife here & DO NOT want any increase in freighter traffic.	
Ch07-129	Irene Svete	The local orcas were declared an endangered species in 2005. They have not recovered and are still declining. This plant adds yet another layer of danger to their recovery.	Thank you for your comment.
Ch07-130	Mary Ratermann	First, any increased vessel traffic through Puget Sound will have a negative impact on our already decreasing numbers of Orcas. The noise of these vessels, have impacted the health of our whale population, which has declined rapidly, and this has not been adequately researched at this point. The loss of this iconic species would be tragic in countless ways that are unfathomable at this point.	Thank you for your comment.
Ch07-131	Suzanne Myers	The noise from the vessels will further disrupt the already stressed Orcas in the Salish Sea.	Thank you for your comment.
Ch07-132	Ashley Ryder	Our planet does not need more toxic compounds. The endangered southern resident orcas cannot afford a toxic spill. The orcas already experience too much noise pollution in their hunting grounds, we do not need more tanker traffic. Spills, traffic, noise, chemicals; no.	Thank you for your comment.
Ch07-133	Jenny Weinstein	This project will require 120 additional (annual?) tank vessel transits through the Salish Sea and we already know that the current level of vehicle traffic is harming our endangered resident orca population.	Thank you for your comment.
Ch07-134	Elisabeth Robson	An increase in tanker traffic in the Salish Sea will damage the habitat of Orca whales, which support the booming tourism business in the area.	Thank you for your comment.
Ch07-135	Carl Ullman	4. Noise. The analysis of noise impacts on, particularly, killer whales is inadequate and logically inconsistent. The DEIS relies on the logic that species sensitive to the noise levels of the vessels associated with the Tesoro project will have already left the area	The Draft EIS analyzes potential noise impacts on marine mammals related to increased vessel traffic during the proposed project's construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of

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		<p>because such noise levels are already present with existing traffic (so impacts can be expected to be essentially zero). At the same time the DEIS notes that much of the additional vessels' transits will be in the critical habitat areas of the whales. Either the whales utilize the critical habitat despite existing noise, or they do not use the critical habitat because of noise. If the former, the DEIS assumption is simply wrong. If the latter, the DEIS must insist on reduction of noise, not its incremental increase. In either event, the EIS should insist on mitigation or avoidance of increases in noise. This should be done in close consultation with NOAA and if the impacts cannot be mitigated the proposal should not be permitted.</p>	<p>increased noise in Section 7.7 of the Draft EIS.</p> <p>Additional information concerning potential impacts of the proposed project on Southern Resident killer whales, including potential impacts from noise, is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS</p> <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016).</p>
Ch07-136	Ruth Holder, Phillip Holder	<p>Additionally, we agree with the comment made by Lovell Pratt at the public hearing on April 17, 2017 concerning significant adverse impacts on the Southern Resident Killer Whales (SRKW) from oil spills and vessel noise. We also hereby fully incorporate by reference the entirety of Ms. Pratt's comment. We note a mistake in the transcript of Ms. Pratt's comment: "No one has declared</p>	<p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the</p>

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		<p>southern resident killer whales as one of only eight spotlight species -- out of 1,652 -- on the endangered species list.” The italicized text should be “NOAA” meaning the National Oceanic and Atmospheric Administration (NOAA) within the U.S. Department of Interior.</p> <p>To these referenced comments we add the following. A close and comprehensive analysis of these impacts on the SRKW over the life of the project is crucially important in light of recent dramatic losses of individual animals - 7 whales were lost in 2016. These losses leave uncertain whether J Pod in particular can continue to survive even for the short term if additional environmental harm to this pod occurs. The DEIS fails to fully analyze impacts to the SRKW. Its consideration of impacts on the SRKW is based on an unreasonable and artificially restricted study area in §6.2.1 and Ch. 2, figure 2.4 (refinery wharf to 12 nautical miles seaward of the entrance to the Strait of Juan de Fuca) that omitted consideration of reformate, gasoline blendstock and/or vessel fuel and machine oil spills and vessel noise along the entire reformate transportation route (transportation to and backhaul from the Anacortes facility and anchorage) within the SRKW’s habitat along the outer coasts of California, Oregon, Washington and British Columbia. A close and comprehensive analysis of these impacts on the SRKW is critically important. The FEIS must expand the study area for impacts on the SRKW and provide thorough analysis of the indirect and cumulative adverse impacts on the species. As mitigation for noise impacts, the FEIS must recommend that the permit require all vessels associated with the project to be accredited as quiet by ship classification societies.</p>	<p>endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA. Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the ESA and MMPA is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>An expanded discussion for Southern Resident killer whales is also included in Section 3.5.1 of this Final EIS, including information about why the study area was not expanded to cover the outer coasts of British Columbia, California, Oregon, and Washington. See Section 3.9.2.1 in this Final EIS for additional information regarding potential spills of vessel fuel.</p> <p>The vessels would be inspected by the USCG and would be required to meet applicable USCG and Washington State requirements. The “Silent Class Notation” given by a vessel classification society is a special certification that is normally applied to newer vessels or those vessels with specialty missions; oceanographic research vessels; fishing trawlers (assists the vessel to use fish finding sonar more accurately); smaller cruise ships in sensitive environments, and tour boats that are used to approach large marine mammals and sensitive wildlife and are trying to be less intrusive from an acoustic perspective to the environment; seismic research vessels; and vessels that would regularly be transiting sensitive marine areas. To require vessels associated with the proposed project to do this along the shipping channel would make a negligible reduction in the acoustic impact on the environment.</p>
Ch07-137	Virginia Wolff	<p>The DEIS fails to adequately examine the impacts of marine vessel noise on the Southern resident killer whales during transit of the vessels through channels frequented by these whales. The DEIS implies that the whales could avoid the approximately 5 mi. radius around large ships where the noise would impact them, and that</p>	<p>The Draft EIS analyzes potential noise impacts on marine mammals related to increased vessel traffic during the proposed project’s construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts</p>

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		<p>this would be a small reduction in their habitat. It also implies that these whales spend most of their time in Haro Strait along the west coast of San Juan Island. In fact, recent whale deaths suggest the whales may be suffering a degree of starvation, and vessel noise disrupts their communication with each other about where to find food. Even small impacts to these endangered creatures must be considered significant. They may be most frequently sited in Haro Strait, but we have seen them at the south end of Georgia Strait, and within 1-2 mi. of March Point off the southeast coast of Guemes Island.</p>	<p>on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p> <p>The Draft EIS discusses the increase in vessel traffic as a result of the proposed project in Section 13.3. Additional information about the vessel traffic analysis for the proposed project is provided in Section 3.9 of this Final EIS. Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of pinnipeds and whales within 5 miles of the marine vessels.</p> <p>Measures that would be taken to protect marine mammals, including the Southern Resident killer whale, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 <p>NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-55, July 2016).</p> <p>Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-138	Protect Skagit, Washington	There are several significant threats to endangered Southern Resident Killer Whales on which NOAA and best available science	The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA

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	<p>Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>should have been consulted.</p>	<p>require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA. Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the ESA and MMPA is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-139	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for</p>	<p>Impacts to Southern Resident Killer Whales must be more carefully reviewed</p> <p>The Southern Resident Killer Whales (SRKW)s population is at a critical juncture. NOAA has declared SRKWs one of only eight “Spotlight” species (out of 1,652 on the Endangered Species list). Spotlight species are considered most at risk of extinction unless immediate action is taken to stabilize and recover their populations (see http://www.nmfs.noaa.gov/stories/2015/05/05_14_15species_in_the_spotlight.html and http://www.nmfs.noaa.gov/stories/2015/06/spotlight_srkw.html).</p> <p>The FEIS should be expanded to include consultation with NOAA in order to fully address the proposed project’s impacts to the state and federally listed as endangered SRKWs from vessel noise and oil</p>	<p>In reference to the draft paper mentioned in this comment, the paper indicates more than 66 percent of the gross polluters, which comprise 15 percent of the total fleet, are cargo and container ships. In addition, only 5 percent of the gross polluter fleet was identified as tankers. The referenced paper seems to support the analysis of potential impacts from increased vessel traffic in the Draft and Final EIS. Section 7.4.2.6 of the Draft EIS discusses the underwater noise effects from marine vessel operation associated with the proposed project (i.e., behavioral effects including the difficulty of these marine animals to use their echolocation for hunting for fish, etc.).</p> <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any</p>

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	Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>and hazardous and toxic substance spills.</p> <p>The geographic scope of the analysis in the DEIS is inappropriately narrow. The FEIS should include, in the assessment of both vessel noise and oil spill impacts to SRKWs, the entire SRKW range along the outer coasts of British Columbia, California, Oregon, and Washington State given that project related vessels will transport reformat from other west coast refineries to the Tesoro Anacortes refinery and backhaul gasoline blendstock. (See page 240, “The reformat feedstock would be received at the Tesoro Anacortes Refinery by marine vessels transiting from other West Coast refineries. Refinery locations and, therefore, the marine vessel transportation routes, would vary depending on market conditions.” and “This gasoline blendstock would then be backhauled to the original refinery that supplied that reformat feedstock.”)</p> <p>The DEIS makes the mistake of assuming, without evidence, that the number of additional vessels associated with the proposed project, as a percentage increase, correlate with the proposed project’s vessel traffic noise impacts to SRKWs and other marine species. This is not supported by the best available science (see “A key to quieter seas: half of ship noise comes from 15% of the fleet” https://dx.doi.org/10.22541/au.149039726.69540798).</p> <p>If the project’s impacts to SRKWs can’t be mitigated, the project proposal should be denied. At a minimum, both the FEIS and the shoreline permits should require all vessels associated with the project to be accredited as quiet by shipclassification societies.</p>	<p>action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA. Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the ESA and MMPA is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>An expanded discussion for Southern Resident killer whales is also included in Section 3.5.1 of this Final EIS, including information about why the study area was not expanded to cover the outer coasts of British Columbia, California, Oregon, and Washington.</p> <p>The vessels would be inspected by the USCG and would be required to meet applicable USCG and Washington State requirements. The “Silent Class Notation” given by a vessel classification society is a special certification that is normally applied to newer vessels or those vessels with specialty missions; oceanographic research vessels; fishing trawlers (assists the vessel to use fish finding sonar more accurately); smaller cruise ships in sensitive environments, and tour boats that are used to approach large marine mammals and sensitive wildlife and are trying to be less intrusive from an acoustic perspective to the environment; seismic research vessels; and vessels that would regularly be transiting sensitive marine areas. To require vessels associated with the proposed project to do this along the shipping channel would make a negligible reduction in the acoustic impact on the environment.</p>
Ch07-140	Tesoro Anacortes Refinery, Rebecca Spurling	<p>Tesoro submits this letter, to assist Skagit County in clarifying the analysis of impacts from the CPUP, particularly in the following areas:</p> <ul style="list-style-type: none"> • The CPUP would not contribute to significant adverse cumulative 	<p>The Draft EIS analyzes potential noise impacts on marine mammals related to increased vessel traffic during the proposed project’s construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of</p>

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		<p>impact on the Southern Resident Killer Whale.</p>	<p>increased noise in Section 7.7 of the Draft EIS.</p> <p>Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-141	Tesoro Anacortes Refinery, Rebecca Spurling	<p>G. The CPUP Will Not Contribute to Significant Adverse Cumulative Impacts on the Southern Resident Killer Whale Population.</p> <p>Tesoro supports and agrees with the DEIS conclusion that the CPUP will have less than significant adverse direct or indirect impacts on the marine environment, including Southern Resident killer whales.⁴³ However, we encourage the County to revisit its conclusion that purported increases in vessel traffic from the CPUP could "contribute to potential cumulative impacts on the Southern Resident Killer Whale population."⁴⁴ The FEIS should clarify that any contribution to cumulative effects would be less than significant. In particular, the FEIS should not rely exclusively on a conclusion about cumulative impacts lifted from a report that was prepared by the Canadian National Energy Board (NEB).⁴⁵ The NEB prepared its report as part of its review of the Trans Mountain Expansion Project pursuant to a different regulatory system. The DE IS incorporates a conclusion from the NEB Report that the increase in marine vessels associated with the proposed Trans Mountain project would further contribute to significant adverse cumulative impacts.⁴⁶ Without further analysis, the DEIS then concludes that increases in vessel traffic from CPUP would similarly contribute to cumulative impacts. As explained below, the FE IS should not simply copy a conclusion from the NEB Report about a different project and assume it is an adequate substitute for its analysis of the CPUP's purported contributions to cumulative impacts. While vessel traffic from the Trans Mountain Expansion Project will also travel through the Salish Sea, there are meaningful differences between the vessel traffic from that project and that from the CPUP. Those differences should result in</p>	<p>The potential impacts resulting from increased marine vessel traffic through sensitive marine areas of the Salish Sea, including potential impacts on the Southern Resident killer whale, are discussed in Chapter 7 of the Draft EIS. The Draft EIS analyzes potential noise impacts on marine mammals related to increased vessel traffic during the proposed project's construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS.</p> <p>The Draft EIS discusses the increase in vessel traffic as a result of the proposed project in Section 13.3. As described in the Draft EIS, noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of pinnipeds and whales within 5 miles of the marine vessels. However, the Southern Resident Killer whales spend the majority of their time on the west side of San Juan Island and not in the marine vessel transportation route to the south.</p> <p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant. The SEPA Rules define "significant" as something that has a <i>reasonable likelihood of more than a moderate adverse impact on</i></p>

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		<p>different conclusions about potential cumulative impacts. Therefore, we request that the FEIS consider project-specific information and other relevant studies into its SEPA cumulative impacts analysis when considering CPUP's potential contribution. On that basis, the FEIS can clarify that CPUP would not contribute to significant adverse cumulative impacts on the Southern Resident killer whale population.</p> <p>1. Misrepresentation of the Marine Vessel Traffic Baseline As a preliminary matter, the conclusion in the DEIS about potential cumulative impacts on the Southern Resident killer whale population relies on the incorrect assumption that the CPUP would increase vessel calls at the facility or in aggregate with other vessel traffic.⁴⁷ However, as explained in further detail above, the CPUP would not increase overall vessel traffic. Even with the CPUP, there would be about 52 fewer calls per year at the facility than the historical baseline at the Refinery, as depicted in Figure 2. Moreover, commercial shipping vessel traffic, in the aggregate, is also trending downward, as depicted in Figure 1. Accordingly, even if the County were to continue to rely exclusively on the NEB Report, the FEIS should conclude that the CPUP would not contribute to significant adverse cumulative impacts on the Southern Resident killer whale because the CPUP will not increase vessel traffic above the historical baseline.</p> <p>2. Improper Reliance on the NEB Report for Cumulative Effects Analysis The County's FEIS should not simply accept the conclusion in the NEB Report and assume it is applicable to the CPUP. There are meaningful differences between the Trans Mountain project (the subject of the NEB Report) and CPUP that should yield meaningful differences in the County's cumulative impacts assessment.</p> <p>First, the volume of marine vessel traffic attributable to the Trans Mountain Expansion Project is much greater than the amount that the DEIS attributes to the CPUP. The Trans Mountain Expansion Project's vessel traffic is about 348 vessels per year (34 vessels per month). By comparison, Tesoro anticipates approximately 60 vessels per year (5 vessels per month) to support the production and shipment of mixed xylenes. As indicated above, vessel traffic</p>	<p><i>environmental quality. Significance involves context and intensity and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred (WAC 197-11-794).</i> The potential impacts from an uncontrolled spill (i.e., no spill response), for example, were identified as being potentially significant for a worst-case spill or maximum most probable spill and less than significant for an average most probable spill.</p> <p>Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects, including the Kinder Morgan Trans Mountain Pipeline Expansion project along with several others, and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Marine resources potentially impacted by the proposed project including impacts on Southern Resident killer whales from marine vessels in combination with these foreseeable future projects and actions are discussed in Section 7.7 of the Draft EIS. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. Cumulative impacts from marine transportation, including vessel traffic, vessel safety, and spill risks, are discussed in Section 13.6 of the Draft EIS.</p> <p>It is acknowledged that the volume of marine vessel traffic is going down compared to historic levels. However, the current reduced volume of marine vessel traffic has the potential to impact marine and nearshore resources, including orca whales. Therefore, an increase in marine vessel traffic above current baseline levels has the potential to increase impacts on marine and nearshore resources. The CPUP results in a small increase in marine vessel traffic compared to the current</p>

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		<p>that is attributed to the CPUP will not increase traffic from the facility, when comparing to the historical baseline, or in the aggregate, when added to other traffic. Nevertheless, the volume of traffic attributed to the Trans Mountain Project is nearly six times that of the traffic attributed to the CPUP.</p> <p>Second, the marine vessel route for the Trans Mountain project is substantially different geographically than the route used by the CPUP. Whereas Trans Mountain vessels use the Haro Strait along the west side of San Juan Island, CPUP vessels would use Rosario Strait. As a consequence of transiting Haro Strait, Trans Mountain vessels in Haro Strait are much more likely to encounter killer whales than vessels traveling Rosario Strait as shown in in Figure 3.48 Figure 3 demonstrates that the observed incidents involving vessels and Killer Whales are predominantly in Haro Strait. Figure 3 also depicts the vessel route for vessel traffic leaving the project Site through Rosario Strait. The DEIS's exclusive reliance on the NEB Report ignores this crucial distinction between vessel routes when assessing cumulative impacts to the Southern Resident Killer Whale population. The very evidence upon which the DEIS relies identifies the importance of Haro Strait through which the CPUP vessels would not travel.</p> <p>[Figure 3. Observed Interaction between Marine Vessels and Killer Whales in the Salish Sea]</p> <p>Third, the NEB Report relies on a Population Viability Analysis (PVA) performed by the Raincoast Conservation Foundation that is based on an incorrect assumption about the exposure of killer whales to vessel traffic that is inapplicable to the CPUP.⁴⁹ The PVA wrongly assumes for Trans Mountain vessels that "Southern Residents could be around boats up to 100% of the time- according to the proponent tankers would be a 'near continuous' presence."⁵⁰ This flawed assumption is wholly incorrect if applied to the CPUP, as Figure 3 demonstrates. The incorrect assumption contributes to overestimates of the possibility of impacts from oil spills, noise effects, and vessel strikes, and the adverse effects of CPUP on killer whale feeding. 5 1 Furthermore, the Raincoast Conservation Foundation PVA discounts the mitigative aspects of recovery strategies, protective regulations, and maritime best</p>	<p>baseline, and the Draft EIS evaluated the associated increase in potential impacts as less than significant for orca whales. Further, marine vessel traffic attributable to the Trans Mountain Expansion Project is much greater than the amount the Draft EIS attributes to the CPUP. However, vessel traffic associated with the CPUP would still overlap with the Trans Mountain vessels within the Salish Sea, near the Strait of Juan de Fuca which is encompassed by the SRKW critical habitat. Due to the current status of the SRKW population, additional cumulative impacts to the species were considered potentially significant in the Draft EIS.</p> <p>While marine vessel traffic may affect orca, it may not be the primary factor affecting Southern Resident killer whales. A recent publication from the University of Washington (Wasser et al, 2017) conducted research on stress hormone levels and pregnancy rates in orca whales from 2008 to 2014 in the study area of the EIS. The study specifically focused on the Southern Resident killer whale population. Temporal patterns in the stress hormone profiles of the Southern Resident killer whales suggested seasonal timing and overall strength of Chinook salmon runs in the Columbia and Fraser Rivers were primary driving factors for observed periods of stress in the orca whale population. Nutritional stress was shown to be associated with a reduction of successful pregnancies for orca whales, which ultimately impairs the potential for recovery of the endangered population. Data was also collected every half hour for the number and type of marine vessels within 0.5 miles of the Southern Resident killer whales for the duration of the study. The study found that stress hormone levels were correlated with the abundance and availability of Fraser River Chinook salmon instead of marine vessel traffic. Exposure to toxins and disturbance from marine vessel traffic were identified as having potential cumulative effects. However, the publication concluded that a reduction in the preferred prey (threatened and endangered Chinook salmon) appears to be the primary factor for the historic and ongoing decline of orca whales.</p> <p>Additional information regarding agencies responsible for</p>

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		<p>management practices that cumulatively reduce potential impacts from marine vessels, and which are highlighted in these comments, below. These incorrect assumptions in the PVA further demonstrate the flaw of relying exclusively on a conclusion in the NEB Report.⁵² Consequently, Skagit County should not rely on the NEB Report as a surrogate for Southern Resident killer whale cumulative effects analysis and should not infer that killer whale would be adversely affected by marine vessel traffic.</p> <p>3. Other Analyses Support Different Conclusions</p> <p>Other studies reached different conclusions about the potential for marine vessels to impact killer whales.</p> <p>First, marine resources studies recognize that commercial shipping vessels are less likely to impact killer whales than other vessel types. These studies conclude that whale watching boats are much more likely to disturb killer whale and instigate incidents with killer whales than commercial ship and barge traffic.⁵³ Indeed, NOAA acknowledged the relatively minor effects of cargo ships, tankers, and tug boats transiting in the shipping lanes by exempting them from vessel regulations to protect killer whales because "the primary concern based on available information is the sound from small, fast moving vessels moving in close proximity to the whales and targeting the whales."⁵⁴ Commercial shipping vessels do not target whales like commercial and recreational whale watching boats. They proceed in a usually predictable straight path at relatively low speeds along shipping lanes designated by the International Maritime Organization and are likely to be detected and avoided by Southern Resident Killer Whales.⁵⁵ In particular, the lower speed reduces operational noise from ships and reduces collision risks.⁵⁶</p> <p>Studies of commercial shipping in the Salish Sea concluded that additional vessel traffic would not contribute to potential significant cumulative impacts. For example, the BP Cherry Point Dock Extension project included a cumulative effects analysis that concluded the following:</p> <ul style="list-style-type: none"> • "The likelihood of a vessel collision with killer whales attributed to vessel traffic ... is expected to be very low." Even though 	<p>regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. It is acknowledged that other laws and treaties also provide protection to marine resources from marine vessel traffic. The Canadian Endangered Species Council is responsible for protection of species at risk in Canadian waters, specifically species protected under the Species at Risk Act. Under the point Elliot Treaty, the tribes of the greater Puget Sound region reserved pre-existing right of taking fish at usual and accustomed grounds and stations and the privilege of hunting and gathering natural resources on open and unclaimed lands in common with other citizens.</p> <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in the regulatory Table 2 in Section 3.1 of this Final EIS. Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding vessel types and vessel traffic including vessel speed, noise, tug escorts and piloting is provided in Section 3.5.1 and 3.9.1 of this Final EIS.</p> <p>Requirements for the safe handling, transportation, and storage of oils and hazardous substances are administered by the U.S. Coast Guard, Washington State Department of Ecology, and U.S. Environmental Protection Agency. Additional information regarding agencies responsible for regulating the safe handling and storage of oils and hazardous substances is provided in Table 2 in Section 3.1 of this Final EIS. Additional information on the Point Elliott Treaty is provided in Section 3.8.1.3 of this Final EIS.</p>

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		<p>"whales ... are present in the study area, the probability of a vessel strike occurring as a result of the Proposed Action is sufficiently unlikely to be considered discountable."⁵⁷</p> <ul style="list-style-type: none"> • "[Killer] whales are likely to begin moving away from the vessel when they hear the vessel. .. this would reduce a whale's exposure to sound both in duration and intensity" and "temporary elevated sound levels associated with vessel traffic in the study area is not expected to adversely affect southern resident killer whales."⁵⁸ • "Much of the energy contributed by vessels calling at the BP Cherry Point dock falls below 1kHz, which is a frequency range not particularly important to killer whales."⁵⁹ • "Changes in vessel traffic calling at the BP Cherry Point dock would not result in changes to surface waters in the study area compared to existing conditions."⁶⁰ • "While the cumulative effects analysis estimates an increase in potential accidents and spill volume due to the addition of other projects in the region, these projects would not all occur in the same time frame. Therefore any changes in system-wide risk would be incremental."⁶¹ These conclusions are more relevant to CPUP analysis than the NEB Report because vessels from BP Cherry Point travel through Rosario Strait, not Haro Strait. <p>Similarly, studies from other projects in the Salish Sea demonstrate the importance of the location of the vessels to the whale populations when assessing potential impacts. In an Environmental Assessment for a pier and upland support facilities construction project located in Port Angeles Harbor, the Navy concluded that no behavioral disturbance to the Southern Resident Killer Whale would occur from the proposed project because the species does not typically occur in the area and a marine mammal monitoring plan would further minimize potential impacts.⁶² Relatively few Southern Resident Killer Whales have been observed in much of the area transited by the CPUP marine vessels.</p> <p>Similarly, a biological opinion on potential impacts to killer whales by the National Marine Fisheries Service (NMFS) reinforces the</p>	

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		<p>need to consider more precisely any relevant sighting data and other project-specific information, including types of vessels associated with the project.⁶³</p> <p>These studies stand in contrast to the conclusory statement the DE IS copied from the NEB Report. Collectively, they support a conclusion that CPUP would not contribute to significant adverse cumulative impacts on the Southern Resident killer whale population.</p> <p>4. Protective Regulations and Best Management Practices Reduce Impacts of Marine Vessels on Killer Whales</p> <p>The DEIS analysis does not account for numerous regulations, recovery actions, and best management practices that reduce potential cumulative impacts from marine vessels to insignificance. Taken together, these measures would support a conclusion that the CPUP would not contribute to significant adverse cumulative impacts on the Southern Resident killer whale population.</p> <p>These protective measures include regulations governing vessel design (including double-hull construction) and operation, including pilotage and escort requirements, vessel vetting, materials handling, and spill planning and response, and speed restrictions.⁶⁴ They also include protective regulations for killer whales such as Marine Mammal Protection Act, Endangered Species Act, Tribal treaty trust responsibilities, Canada's Marine Mammal Regulations, and Washington's endangered species protections. They also include Protective Regulations for Killer Whales in the Northwest Region, which was promulgated to reduce whale-vessel interactions.⁵⁵</p> <p>In summary, we encourage the County to revise its assessment of potential cumulative impacts on the Southern Resident killer whale population. The DE IS conclusion is based on the false assumption that the project increases vessel traffic. Moreover, it improperly uses another study's conclusion about vessel traffic from a different project as a surrogate for analysis of the CPUP. The DEIS has incorrectly assumed the context and intensity of marine vessel traffic for cumulative effects analysis. It does not consider comparable analyses of marine vessel effects on Southern</p>	

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		<p>Resident Killer Whale that conclude that adverse cumulative effects would be less than significant. Finally, the DE IS did not take into consideration extant protective regulations and best marine vessel management practices that reduce potential impacts to killer whale. When the County addresses these items, it can conclude that neither the likelihood nor consequence criteria of WAC 197-11-795 are met. Therefore, the cumulative impacts of marine vessel traffic on killer whale are less than significant.</p>	
Ch07-142	Orca Network, Howard Garrett	<p>Here are just a few ways this project would inevitably degrade the ecological productivity of the Salish Sea, thus harming orcas and human residents:</p> <p>...</p> <ul style="list-style-type: none"> • The increase in vessel traffic also increases deterioration of foraging capabilities of our endangered orcas from noise impacts. 	<p>The Draft EIS analyzes potential noise impacts on marine mammals related to increased vessel traffic during the proposed project’s construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS.</p> <p>Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-143	Orca Network, Howard Garrett	<p>We ask that the Final Environmental Impact Statement include:</p> <p>...</p> <ul style="list-style-type: none"> • Consultation with NOAA to fully address the project’s impacts to the state and federally listed Southern Resident Orca Community, including impacts from project vessel noise and spills of all cargoes and propulsion fuels. If the project’s impacts to our beloved endangered orcas can’t be mitigated, the project proposal should be denied. 	<p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or designated critical habitat and for marine mammals protected under the MMPA. Additional information regarding agencies responsible for marine vessels and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section</p>

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			<p>3.1 of this Final EIS.</p> <p>An expanded discussion for Southern Resident killer whales is included in Section 3.5.1 of this Final EIS. See Section 3.9.2.1 in this Final EIS for additional information regarding potential spills of vessel fuel.</p>
Ch07-144	Dawn D'Haeye	I strongly oppose this project due to its potential detrimental effect on the Salish Sea. We need fewer ships in the area, not more. Our Orca population is already in trouble due to humans, and we can't afford to add to the problems.	Thank you for your comment.
Ch07-145	Michael Godwin	<p>I ask that the Final Environmental Impact Statement include:</p> <p>...</p> <ul style="list-style-type: none"> • Fully address the project's impacts to the state and federally listed as endangered Southern Resident Killer Whales, including impacts from project vessel noise and spills of all potential cargo and propulsion fuels. If the project impacts can not be mitigated the project proposal must be denied. 	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine resources—Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Water quality—Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Vessel safety and waterway management—Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act—Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>Potential impacts to marine mammals as a result of noise from increased vessel traffic re discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6
Ch07-146	Barbara Aguero	- The increased tanker traffic in this sensitive waterway - increased noise level for our resident orca population. The cumulative noise	Thank you for your comment.

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		of all the traffic is making the environment unlivable for these gorgeous creatures.	
Ch07-147	Anonymous	We are already constantly fighting for the safety of our orca. We're already facing starvation of our orca due to poor management over fishing starvation from pollution.	Thank you for your comment.
Ch07-148	Ann Brooking	Also the noise from yet more vessel traffic and the impact on orcas and their hunting needs closer study. It is more and more difficult for orcas to survive given the various impacts of human development. We should put the orcas' interests before human interests of making money. Orcas depend on the health of the vast eel grass beds, the bottom of the food chain in Padilla Bay and the Salish Sea.	<p>Information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>The Draft EIS discusses the potential impacts of increased marine vessel traffic on Southern Resident killer whales and marine vegetation in the following sections:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operations – Section 7.4.2 <p>Measures that are being taken to protect marine mammals, including the Southern Resident killer whale, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 <p>Potential impacts to marine mammals as a result of noise from increased vessel traffic and potential vessel strikes are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6 • Marine vessel strikes during construction – Section 7.4.1.2

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			<ul style="list-style-type: none"> Marine vessel strikes during operations – Section 7.4.2.2
Ch07-149	Walter Guterbock	Some of the arguments against are simply silly. For example, a few extra ships carrying export products per day will make no significant difference in the amount of noise in the water, considering all of the boat traffic in the Salish Sea. So any effect on whales will be negligible.	Thank you for your comment.
Ch07-150	Ben Bama	There will be increased vessel traffic and NOAA needs to be consulted to address impacts to the endangered Southern Resident Killer Whale population.	<p>Potential impacts to Southern Resident killer whales from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> During construction – Section 7.4.1 During operations – Section 7.4.2 Cumulative impacts on Southern Resident killer whales and other marine resources – Section 7.7 <p>Measures that are being taken to protect marine mammals, including the Southern Resident killer whale, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected</p>

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			<p>under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016).</p> <p>Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-151	Heather Oaks	It is going to be a huge mistake and it will bring more traffic vessels through our waters. It will impact our Orca whales it will ruin tourism should there be a xylene spill of any kind will destroy the sound it's not clean-up-able and I believe that it should not be allowed to occur especially if the impact to our Orca whales can't be mitigated the project proposal should be denied	Thank you for your comment.
Ch07-152	Camille Meehan	My main concerns are that of the increased tank vessel traffic noise and spill risk. Increased vessel noise will make it more difficult for our 78 endangered southern resident killer whales to find food and safely navigate the Salish Sea. The 78 endangered orcas are a Washington state treasure and must be protected. They will go extinct if not carefully tended by the locals. Businesses and citizens must do everything we can to get them safely off of the endangered species list (because there are so many of them alive and thriving) before increased vessels are permitted.	Thank you for your comment.
Ch07-153	Camille Meehan	I ask that your final EIS include the following as well as address any of my comments above:	Thank you for your comment.

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		<p>...</p> <ul style="list-style-type: none"> • If the project's impacts to our 78 endangered orca whales can't be mitigated, the project proposal must be denied. 	
Ch07-154	Camille Meehan	<p>I ask that your final EIS include the following as well as address any of my comments above:</p> <p>...</p> <ul style="list-style-type: none"> • Fully address the project's impacts to the state and federally listed as endangered Southern Resident Killer Whales, including impacts from project vessel noise and spills of all potential cargo and propulsion fuels. If the project impacts can not be mitigated the project proposal must be denied. 	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine resources—Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Water quality—Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Vessel safety and waterway management—Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act—Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>Potential impacts to marine mammals as a result of noise from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6
Ch07-155	Ursula Mass	<p>There are so many more problematic issues that would take hours to discuss, however there is one more issue that is close to my heart as a lover of nature and wildlife. Final EIS should also include consultations with NOAA to fully address the project's impacts to the state and federally listed as endangered Southern Killer Whales, including impacts from project vessel noise and spills of all cargos and propulsion fuels. IF THE PROJECT' S IMPACTS TO THE SOUTHERN RESIDENT KILLER WHALES CAN' T BE MITIGATED, THE PROJECT PROPOSAL SHOULD BE DENIED .</p>	<p>The Draft EIS discusses the potential impacts of increased marine vessel traffic, vessel noise, and marine spills on marine wildlife, including Southern Resident Killer whales, in the following sections:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operation – Section 7.4.2 • During a spill – Section 7.4.3 • Cumulative impacts on Southern Resident killer whales and

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			<p>other marine resources – Section 7.7</p> <p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016).</p> <p>Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of</p>

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			this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding potential spills of vessel fuel is provided in Section 3.9.2.1 of this Final EIS.
Ch07-156	Robin Hirsch	<p>Tesoro should NOT be permitted to transport xylene on the Salish Sea for the following reasons:</p> <p>...</p> <p>The increase in vessel traffic also increases noise impacts to our endangered orca whales.</p>	Thank you for your comment.
Ch07-157	Teresa Catford	<p>A few more jobs won't tip the scale in Tesoro's favor when on balance the negative consequences are so high:...2) increased chance of toxic, deadly spills due increased tanker traffic in the Salish Sea. Our resident Orcas already face too many threats. Also, when the EPA slashes the funding to Puget Sound as they intend, the State will be impotent to hold Tesoro accountable;...</p>	Thank you for your comment.
Ch07-158	Val Veirs	<p>I have read that this project may lead to 120 or so xylene tanker trips a year traveling through the Salish Sea.</p> <p>I am concerned that this additional tanker traffic increases the chances that the Southern Resident Killer Whales (SRKW) may go extinct either because of additional harassment by noise and vessel traffic or by a catastrophic marine accident.</p> <p>Tankers produce much underwater noise in the hearing range of the orcas. For scientific support, please refer to my recently published peer reviewed paper titled "Ship noise extends to frequencies used for echolocation by endangered killer whales" (PeerJ Veirs, Veirs, & Wood, January, 2016,, DOI 10.7717/peerj.1657). There you will see in Table 2 that we measured 148 tanker transits here in the Salish Sea and found that their average source level is 174 dB which is very loud. We also found that tanker's emit lots of noise in the hearing range of the orcas making it more difficult for these animals to use their echolocation capability for hunting for fish and more difficult to</p>	<p>Potential impacts to Southern Resident killer whales from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operations – Section 7.4.2 • Cumulative impacts on Southern Resident killer whales and other marine resources – Section 7.7 <p>Measures that are being taken to protect marine mammals, including the Southern Resident killer whale, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2

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		<p>use their social vocalizations to organize their cooperative activities.</p> <p>I ask you to seek the input of the experts at NOAA to evaluate the threat that additional tanker traffic has to the orcas. This should be just like the Section 7 consultation under the Endangered Species Act that is required of any action that involves Federal decision making....Even if a Federal agency is truly not involved, you should request a consultation with NOAA because they are experts and you should be taking responsibility for protecting rather than causing likely harm to our endangered Southern Resident Orcas.</p>	<p>Noise from operation of marine vessels associated with the proposed project has potential to disturb behavior of whales within 5 miles of the marine vessels. However, due to the short duration of disturbance, proposed project marine vessel operation is unlikely to impact behavior of marine wildlife to an extent that would reduce the viability of a population of a marine wildlife species.</p> <p>Potential impacts to marine mammals as a result of noise from increased vessel traffic and potential vessel strikes are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6 • Marine vessel strikes during construction – Section 7.4.1.2 • Marine vessel strikes during operations – Section 7.4.2.2 <p>In reference to the peer reviewed paper mentioned in this comment, Table 2 of the paper indicates the average broadband source level (SL) for a tanker is 174 dB re μPa at 1m. Table 7-16 of the Draft EIS shows that the sound generated from large commercial vessels currently operating at the wharf (181 dB re μPa at 1m) exceeds the average SL for a tanker (174 dB re μPa at 1m) as referenced in the paper. This suggests that marine wildlife (including the Southern Resident killer whale, which is a mid-frequency cetacean) around the wharf and other transport routes are currently exposed to higher or comparable noise intensities when compared with the additional tanker noise proposed during operations. Therefore, marine wildlife would likely already avoid the area. The marine wildlife continuing to use the area are likely accustomed to this level of noise intensity, so these species would not likely be further disturbed by additional noise sources of the same intensity. Section 7.4.2.6 of the Draft EIS discusses the underwater noise effects from marine vessel operation associated with the proposed project (i.e., behavioral effects including the difficulty of these marine animals to use their echolocation for hunting for fish, etc.).</p> <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA</p>

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			<p>require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016).</p> <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-159	Anne Greene	<p>The DEIS does not include a thorough review of the safety requirements and full impacts of the project, such as:</p> <ul style="list-style-type: none"> -the proposed project's impacts to the state and federally listed endangered Southern Resident Killer Whales; 	<p>The Draft EIS discusses the potential impacts of the proposed project on Southern Resident killer whales in the following sections:</p> <ul style="list-style-type: none"> • During construction – Section 7.4.1 • During operation – Section 7.4.2 • During a spill – Section 7.4.3 • Cumulative impacts on Southern Resident killer whales and other marine resources – Section 7.7 <p>Measures that would be taken to protect marine wildlife are</p>

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			<p>discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating the protection of Southern Resident killer whales is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p>
Ch07-160	Pacific Biodiversity Institute	As a scientist who is studying harbor porpoise in the area I note that the proposed change would add 5 vessels per month to those already entering and leaving the Tesoro facility. The presence of harbor porpoise in this part of the Puget Sound is level to decreasing in comparison to all other areas of the Puget Sound where the population is increasing. Reasons for this decrease include shipping noise, disturbance, strikes and loss of usable habitat. It would be detrimental to the health of this marine area for shipping to increase.	Thank you for your comment.
Ch07-161	Mary Carol Britt	Ships passing through the Salish Sea are already large in number threatening our marine wildlife especially our Orca Whales.	Thank you for your comment.
Ch07-162	Joline Betterndorf	Increased impacts from more marine traffic on the Southern resident orcas population is of particular concern. This population is already severely stressed, possibly in crisis and faced with extinction from existing marine traffic noise interfering with their means of survival, impacts with ships, water pollution, and diminishing salmon, their food source. The loss of this icon of the state cannot be mitigated, just as the loss of other values of this	Thank you for your comment.

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		area's residents addressed here cannot be mitigated.	
Ch07-163	Esther Lultikhuizen	- The tankers create noise pollution that negatively impacts our fragile population of endangered Orcas.	Thank you for your comment.
Ch07-164	Sanford Olson	<p>Southern Resident Killer Whales, Economic Drivers in San Juan County</p> <p>The DEIS acknowledges that the Project's study area includes the Southern Resident Killer Whales' (SRKWs') critical habitat and that "the proposed project would contribute to potential cumulative impacts on the Southern Resident killer whale population". However, the DEIS offers no mitigations to address the cumulative impacts to SRKWs from the proposed Project.</p> <p>The SRKW population is at a critical juncture. NOAA has declared SRKWs one of only eight "Spotlight" species (out of 1,652 on the Endangered Species list). Spotlight species are considered most at risk of extinction unless immediate action is taken to stabilize and recover their population.</p> <p>Regarding vessel noise impacts, the number of additional vessels associated with the Project, as a percentage increase, does not have any correlation with the proposed Project's vessel traffic noise impacts to SRKWs and other marine species. Studies have documented that half of the ship noise comes from only 15 % of the vessels.</p> <p>Require the FEIS to include documentation of consultation with NOAA that fully addresses all reasonably foreseeable Project impacts to the state and federally listed as endangered SRKWs, including Project vessel noise and spills of all cargos and propulsion fuels. Require the FEIS to include mitigations for all reasonably foreseeable and cumulative Project impacts to the SRKWs.</p> <p>If Project impacts to our SRKWs' cannot be mitigated, the proposed Project should be denied.</p>	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine resources–Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Water quality–Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Vessel safety and waterway management–Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act–Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>Potential impacts to marine mammals as a result of noise from increased vessel traffic and potential vessel strikes are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6 • Marine vessel strikes during construction – Section 7.4.1.2 • Marine vessel strikes during operations – Section 7.4.2.2
Ch07-165	Sara Fogan	The iconic Southern Resident Killer Whale population is already endangered and facing so many threats to their survival; I am	Thank you for your comment.

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		afraid that exposure to xylene would be/mean their ultimate end.	
Ch07-166	Sanford Olson	This contribution [tank vessel increase] not only poses risk of spills of cargo and fuel but also increases underwater soundscape pollution which demonstrably affects our endangered Orca, reducing their ability to find food, rear young and maintain the cohesive social structure so necessary to their survival.	Thank you for your comment.
Ch07-167	Carolyn Barney	This project which perhaps will create 20 jobs is not worth the risk of losing any of the already endangered Orca whale population as well as other marine life.	Thank you for your comment.
Ch07-168	Val Veirs	Our orcas and salmon are listed as Endangered already. The project should be scrapped if the impacts to these crucial species can't be mitigated.	Thank you for your comment.
Ch07-169	Joan Poor	Increased tank vessel traffic in turn increases noise impacts to our imperiled, endangered orcas.	Thank you for your comment.
Ch07-170	Joan Poor	The final EIS must insure consultation with NOAA to fully address the project's impacts to the state and federally listed as endangered Southern Resident Killer Whales, including impacts from project vessel noise and spills of all cargos and propulsion fuels. The project proposal should be denied if the project's impacts to endangered orca whales cannot be mitigated.	<p>Measures that are being taken to protect sensitive habitats and wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine resources—Sections 6.4, 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Water quality—Chapter 5, Sections 7.4, 2.7.6, and 2.8.5, Appendix 2-A • Vessel safety and waterway management—Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act—Section 7.3.3.10 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>Potential impacts to marine mammals as a result of noise from</p>

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			<p>increased vessel traffic and potential vessel strikes are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6 • Marine vessel strikes during construction – Section 7.4.1.2 • Marine vessel strikes during operations – Section 7.4.2.2
Ch07-171	Gay Wilmerding	Our Southern Orca population is stressed and vessel noise will make communication and food harvest more difficult, thereby weakening immune systems and pod well being.	Thank you for your comment.
Ch07-172	Camille Meehan	I am concerned increased vessel traffic will increase marine mammal vessel strikes. The EIS must mitigate this increased risk of vessel strikes. If there is no way to mitigate the increased risk of vessel strikes to marine mammals the proposal must be denied.	<p>Potential impacts to marine mammals as a result of noise from increased vessel traffic and potential vessel strikes are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Noise during construction – Section 7.4.1.5 • Noise during operations – Section 7.4.2.6 • Marine vessel strikes during construction – Section 7.4.1.2 • Marine vessel strikes during operations – Section 7.4.2.2 <p>Measures that would be taken to protect marine life, including marine mammals, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 <p>Additional information regarding potential impacts of the proposed project on marine and nearshore resources is provided in Section 3.5 of this Final EIS.</p>
Ch07-173	Amanda Sue Rudisill	As one who has loved seeing the antics of the endangered southern orcas, we must not allow anything that could possibly harm them.	Thank you for your comment.

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Ch07-174	Lizbeth DeWitt	I am especially concerned about the impact of increased maritime traffic on our resident orca whales; besides the confusing underwater noise and risk of collision, a spill of these hazardous materials would wipe out what little food these orcas have left.	Thank you for your comment.
Ch07-175	Joanna Schoettler	Protect the ORCAS!	Thank you for your comment.
Ch07-176	Joan Poor	<p>My family has lived in the Seattle area for nearly 150 years. Constant throughout those years are numerous lasting and adverse effects of resource extraction and shipping that have led to environmental and economic degradation. As an example, a once thriving fishing fleet at Anacortes is depleted and our iconic resident Orca population diminished and contaminated with toxins.</p> <p>The weekend of May 6, 2017, as a visitor to the docks at the Cap Sante Marina in Anacortes, I noted the whale fin sculpture and the historic salmon cannery motif at the dock entrance. The orca and salmon are beloved and relevant to the past and present of the Salish Sea. I also noted the nearby refinery, its vapor plumes, and the Asia-bound tankers, with their implications to the fate of these orca and salmon in the future.</p>	Thank you for your comment.
Ch07-177	Mary Lynn Lyke	Our killer whale population is already endangered: further polluting and adding potential for spills is the last thing we should be doing.	Thank you for your comment.
Ch07-178	Dick Larson	The orcas need all of our help to survive, please help them.	Thank you for your comment.
Ch07-179	Macyle Candela	Orcase, not oil!	Thank you for your comment.
Ch07-180	Jim Ploger	Orcas in Puget Sound already are so contaminated that they must be disposed of as toxic waste if their body washes onto shore. Don't add more poisons to the sound!	Thank you for your comment.
Ch07-181	Izzi Lavallee	Like a mother breast feeding her baby, orca mothers nourish their calves through their nutrient rich fatty milk. However, in the last	Thank you for your comment.

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		few decades orca populations in the Salish Sea watershed have dropped over 50%, they have been incapable of keeping their newborn calves alive. Why? Well, when there are pollutants in the water and in the food (especially salmon) which the large animals eat, the toxic chemicals are stored in the blubber, or fat, of the orca. And when an orca mother is feeding her calf, she offloads those toxins through her fatty breastmilk. These calves have a slim chance of surviving on toxic milk.	
Ch07-182	Sharon Andrews	I live in the Puget Sound area, and the Orcas are already stressed. The impact of more ships, and the toxic contents in them will harm our natural environment.	Thank you for your comment.
Ch07-183	Debra Ellers	The Southern Resident Killer Whales are a highly endangered species. They cannot have further risks such as increased vessel traffic and the increased threat of toxic spills.	Thank you for your comment.
Ch07-184	Renee Landuyt	Keep the orcas safe from these nasty chemicals.	Thank you for your comment.
Ch07-185	La Vaughn Standridge	THIS EXPANSION WILL BE DEADLY FOR ORCAS!	Thank you for your comment.
Ch07-186	Holly Stachnik	The resident killer whales must be protected from this project!	Thank you for your comment.
Ch07-187	Michelle Rice	There are only a few hundred of them [orca]! There are are 7.5 billion people. They deserve precedence. Anything that is detrimental to their survival is immoral.	Thank you for your comment.
Ch07-188	Caryn Wagner-McPherson	Tesoro has options. Orcas are already threatened and they do not have options. Please do the right thing and protect orcas.	Thank you for your comment.
Ch07-189	Corinne Salcedo	The passages are narrow and crowded, and that creates too much risk of toxic spills, which would harm marine life, including... our vulnerable, endangered Southern resident orcas. There is also the element of noise pollution and its deleterious effect on the whales, which rely on hearing for navigation, communication, and more.	Thank you for your comment.
Ch07-190	Douglas Tolchin	- Consults with NOAA in order to fully address the proposed	The USFWS and NOAA NMFS were notified of the availability of

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		<p>project's impacts to state and federally protected Sea Otter, Tufted Puffin, Horned Puffin, Humpback Whale Fin Whale, Minke Whale, Dolphin, Porpoise, Sea Lion, Loggerhead Sea Turtle and other such threatened, endangered and otherwise protected species of concern, , and identifies required mitigations for all project impacts;</p> <p>http://www.skagitbeaches.org/documents/2-1_Salish-Sea-Birds.pdf</p>	<p>the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>The Draft EIS discusses potential impacts on marine wildlife, including state and federally threatened, endangered, and special status species, in Chapter 7. Potential impacts on terrestrial wildlife and marine birds, including threatened, endangered, and special status species, are discussed in Chapter 6 of the Draft EIS.</p> <p>Additional information regarding agencies responsible for regulating marine vessels, for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act, and for protecting listed species is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding Southern Resident killer whales and terrestrial wildlife and marine birds is provided in Sections 3.5 and 3.4 of this Final EIS. Additional information regarding the loggerhead sea turtle is provided in Section 3.5.3 of this Final EIS.</p>
Ch07-191	Katherine Babiak	I have spent many years up in Puget Sound, researching Orcas and other cetaceans. I have seen the terrible effects of sound on these animals.	Thank you for your comment.
Ch07-192	Amy Guskin	I would like the orcas to still be alive in the Pacific Northwest so that I can go and see them someday! To that end, I hope you will consider my comments about this project.	Thank you for your comment.
Ch07-193	Dean Evenson	We need the whales to survive so that means no increase of	Thank you for your comment.

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		chemical/oil products being shipped in the Salish Sea	
Ch07-194	Heather Mac Phail	<p>It's simple: If the orcas cannot hear, they cannot hunt. If the orcas cannot hunt, they will starve.</p> <p>The sound pollution of the Salish Sea by your increased huge tanker traffic will deafen the orcas by painfully destroying their delicate "ears."</p> <p>Ergo: the increased huge tanker traffic will drive the orcas -- painfully-- to extinction.</p> <p>It has already been demonstrated that the decibel level of existing vessel traffic in our sea has been harmful to the orcas and dolphins and their ability to echolocate. Your determination to increase this cruelty-for-profit shows only a callous ignorance of our environment and concerns.</p>	Thank you for your comment.
Ch07-195	Mully Mullally	I think the most impact full statement I can make is the direct impact those ships will have on the Whale population as well as the ferry runs in the Sound. If there is NO satisfactory way to guarantee that the whales (that are endangered species) can be protected...then, I request that these tankers not be allowed to traverse our waters.	Thank you for your comment.
Ch07-196	Beverly Faxon	...a final EIS should address the potential impact of vessel noise and a potential spill on endangered Killer Whales, through consultation with NOAA.	The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA. Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the Endangered Species

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			<p>Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales.</p> <p>Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project's construction and operation phases (see Section 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this</p>

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			Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.
Ch07-197	Bob Hall	4. I've done my share of boating in the Salish Sea. I know how destructive anchoring is on eel grass beds. State parks now limit anchoring. I see many tankers anchored near Anacortes and off the eastern side of Guemes. The DE IS did not discuss the impacts of anchoring or whether eel grass beds are found where anchoring occurs. If so, mitigation could be moving anchoring to other areas.	<p>Marine anchorage areas are used at times to secure vessels awaiting to discharge their cargos to a marine terminal. At those times, the capacities of marine terminals may approach capacity necessitating a tankship to anchor and act as a floating storage unit. Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology's Office of Marine Safety.</p> <p>Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. The potential impacts of anchoring associated with the proposed project, including marine vessels during operations, are discussed in Sections 7.4.1.1 and 7.4.2.1 of the Draft EIS, respectively. Marine vessel anchorage data is discussed in Section 13.3.1.3. Additional information regarding marine vessel anchorages is provided in Section 3.9.1.4 of this Final EIS.</p> <p>Baseline conditions were documented from proposed project related studies, public records, and scientific studies listed in Section 7.2.2.1 of the Draft EIS. Depth ranges for eelgrass for different locations in the study area are presented in Table 7-5 of the Draft EIS. As discussed in Section 7.4.2.1, marine vessels associated with the proposed project would not operate in shallow areas that support eelgrass communities, and marine vessels would not be anchored in shallow areas with sensitive habitat or species such as eelgrass beds. Eelgrass and other species of macroalgae are not present in water this deep.</p>
Ch07-198	Martha Hall	7. Anchors tear up eelgrass- ships coming to Anacortes sometimes anchor in eelgrass beds. This has not yet been studied to determine the impacts. A study is needed of where the ships are now anchoring to see if eelgrass is there and on impacts to the eelgrass where anchoring does occur in eelgrass. I have heard that the ships try to anchor in the same place each time. I doubt that	<p>The effects of anchoring associated with the proposed project, including marine vessels during operations, are discussed in Sections 7.4.1.1 and 7.4.2.1 of the Draft EIS, respectively. Marine vessel anchorage data is discussed in Section 13.3.1.3.</p> <p>Baseline conditions were documented from project related studies, public records, and scientific studies listed in Section</p>

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		they are totally accurate in doing that.	7.2.2.1 of the Draft EIS. Depth ranges for eelgrass for different locations in the study area are presented in Table 7-5. As discussed in Section 7.4.2.1 of the Draft EIS, marine vessels associated with the proposed project would not operate in shallow areas that support eelgrass communities, and marine vessels would not be anchored in shallow areas with sensitive habitat or species such as eelgrass beds. Eelgrass and other species of macroalgae are not present in water this deep.
Ch07-199	Martha Hall	Attached - Maps of the eelgrass beds I worry about. [map of Forage Fish Spawning Areas Adjacent to the Proposed Project Area] [map of Project Area and Vicinity Map] [map of Eelgrass East of the Causeway]	Baseline conditions of these areas were documented from proposed project plans and procedures, public records, and scientific studies listed in Section 7.2.2.1 of the Draft EIS. Maps showing the distribution of these eelgrass beds in the study area are shown on Figures 7-1 Marine Vegetation Adjacent to the Project Area, 7-2 Marine Vegetation in the Study Area, and 7-3 Eelgrass East of the Causeway in the Draft EIS. Potential impacts on eelgrass beds are discussed in the following sections of the Draft EIS: <ul style="list-style-type: none"> • Impacts from construction – Section 7.4.1 • Impacts from marine vessels and operations – Section 7.4.2 • Impacts from spills – Section 7.4.3
Ch07-200	Teresa Dix	We must consider the fact that eel grass beds are the nursery beds for marine life, it is essential these eel grass beds be protected from chemical spills. How are these concerns being addressed?	The Draft EIS discusses potential impacts of spills on eelgrass beds in Section 7.4.3. In the event of a spill, response organizations would be deployed to respond to the spill and minimize impacts. Spill response measures consist of preventing the products reaching sensitive areas such as eelgrass beds by selective booming of these areas and controlling access to the spill until the spilled material has evaporated or dissipated. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill likelihood, spill prevention, and response measures are

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			<p>described in the Draft EIS in the following sections:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill likelihood and the potential for increases in vessel traffic to increase spill risks – Section 13.5.6 and Section 13.6 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of oils and hazardous substances are administered by the U.S. Coast Guard, Washington State Department of Ecology, and U.S. Environmental Protection Agency. Additional information regarding agencies responsible for regulating the safe handling and storage of oils and hazardous substances is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch07-201	Ann Brooking	A local spill's effects on Padilla Bay eel grass should be of primary concern as well.	Thank you for your comment.
Ch07-202	Lee First	I'm a North Sound Baykeeper. I'm one of 315 water-keepers around the world who work for swimmable, fishable, drinkable water around the world. My main concern with this project is there's already enormous amount of pollution coming from the wastewater discharges from the refineries at March Point. To name a few, benzopyrene and chrysene and dioxin are in the water right around the refinery. Those are on the state's most polluted waters list, the 303(d) list. And the two new processed chemicals, sulfolane and aqueous ammonia, would be used in the production of xylene. So, that's just going to increase these toxic chemicals that are already out there in way too great a volume. So,	Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761). The existing NPDES Industrial Stormwater Permit requires that Tesoro capture stormwater that falls within the developed portion of the refinery and treat it at the refinery's wastewater treatment plant. Under the NPDES permit, discharges from the refinery to the surrounding waters must be monitored and must adhere to chronic and aquatic life criteria defined by Ecology. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of

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		<p>I believe that we need a better assessment of the significant impacts and the cumulative impacts from these toxic chemicals that are in the effluent discharge as well as in stormwater.</p>	<p>impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The main update to the NPDES permit and/or wastewater pollution prevention plan that would be needed include adding the MVEC area and New Tanks Area to the permit coverage area, as relatively small amounts of stormwater runoff from these areas would now be directed to the wastewater treatment plant, and to account for engineering controls to manage sulfolane.</p> <p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf—Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response—Appendix 2-A • Soil erosion—Section 3.3.2.1 • Freshwater resources (including surface water groundwater, and wetlands)—Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources—Section 7.4 <p>Padilla Bay, Fidalgo Bay, and Guemes Channel are listed by Ecology on the Clean Water Act section 303(d) list of impaired waters. Additional information regarding agencies responsible for regulating industrial discharges to waters of the state, including discharges to waterbodies listed on the Washington State’s 303(d) list of impaired waters, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-203	James MacRae	<p>There is the potential for leaks in the line that goes from the dock to the ship, and this would pollute the surrounding water and impact wild life.</p>	<p>Spill prevention and response measures are currently in place at the refinery, and would be in place for the proposed project. The potential for spills associated with the pipeline from the refinery to the dock and preventive measures are specifically discussed in the Draft EIS. Environmental controls in place at the refinery to manage material transfers along the wharf are described in the refinery’s Wharf Operations Manual (Tesoro 2016b), see Appendix 2-A of the Draft EIS. The pipelines are pressure tested annually and all hoses and flanges are visually inspected for internal damage prior to each transfer by the wharf operator. The</p>

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			<p>pipelines also have over-water leak detection systems and on-shore isolation valves in the event of a leak. The wharf's automatic shutdown system is also inspected annually.</p> <p>Further details about spill prevention and response measures at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A
Ch07-204	Martha Hall	<p>14. The location of our refineries in Anacortes, on both Padilla Bay and Fidalgo Bay, worry me a lot. These two bays are too sensitive and too important to have major refineries who constantly bring in and ship out products that could kill many of the creatures who live in these bays. Anytime humans handle dangerous products they can spill these. whether from trains. trucks. or ships, or the facility. This was not adequately analyzed.</p> <p>March Point is surrounded on three.sides by some ofthe most important marine habitat in the Salish Sea. The eel grass beds in Padilla Bay are the largest in the Salish Sea, and the second largest on the entire west coast of North America. Only one other is larger and that one is in Alaska. This is why this bay was designated as the Padilla Bay National Estuarine Research Reserve. Another important marine area, the Fidalgo Bay Reserve, borders the other side of March Point. With Padilla and Fidalgo Bays surrounding three sides of March Point, it is doubtful that refineries would ever be approved for this location today. We now have a far better understanding and appreciation for the unique and valuable resources provided by these ecosystems.</p>	<p>The ecosystems of Fidalgo Bay and Padilla Bay and their baseline conditions are described in Sections 6.3.2 and 7.3.1 of the Draft EIS.</p> <p>Potential impacts to sensitive marine habitats, including eelgrass beds, are discussed throughout Section 7.4 of the Draft EIS. Potential impacts of spills on terrestrial wildlife, marine life, and nearshore resources are discussed in Sections 6.4.3.2 and 7.4.3 of the Draft EIS.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize impacts. Spill response measures include preventing the products from reaching sensitive areas such as eelgrass beds by selective booming of these areas and controlling access to the spill until the spilled material has evaporated or dissipated. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material.</p> <p>Spill likelihood and spill prevention and response measures are described in the Draft EIS in the following sections:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5

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			<ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill likelihood and the potential for increases in vessel traffic to increase spill risks – Section 13.5.6 and Section 13.6 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of oils and hazardous substances are administered by the U.S. Coast Guard, Washington State Department of Ecology, and U.S. Environmental Protection Agency. Additional information regarding agencies responsible for regulating the safe handling and storage of oils and hazardous substances is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch07-205	Richard Bell	It is this fundamental fact of life, and value, which motivates me to write and urge you to not approve the increased production and transport of Xylene through the ecologically fragile Salish Sea. Beyond the Salish Sea, the entire Puget Sound is a very slowly circulating system of waterways that would suffer incalculable damages if subject to an industrial accident.	Thank you for your comment.
Ch07-206	Nancy Quackenbush	Our uniquely attractive and fragile marine environment needs to be protected from the risks associated with increased transportation of a deadly chemical through its waters.	Thank you for your comment.
Ch07-207	Deborah Rudnick	As a resident of an Island city, I live surrounded by the waters of the Salish Sea, and I am extraordinarily concerned about the impacts of this proposed project on the health and safety of our waters	Thank you for your comment.
Ch07-208	Evergreen Islands	<ul style="list-style-type: none"> • What are the potential impacts on the Skagit River, Padilla Bay, Fidalgo Bay, the San Juan Island archipelago and the Salish Sea from limited or catastrophic petroleum (crude oil, xylene, etc.) 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.

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		<p>spills?</p> <ul style="list-style-type: none"> • What are the impacts from concerns over increased numbers of petroleum (crude oil, xylene, etc.) vessels operating on the Salish Sea-, including the increased risk of ship collisions and groundings? 	
Ch07-209	AJ Kuntze	<p>I DO NOT SUPPORT Tesoro's efforts to engage in a xylene production and export enterprise. It's potential negative impacts on the marine and estuarine environments of Padilla and Fidalgo Bays are too great a risk. Increased oil train and tanker traffic will only increase the potential for spills in and near these bays.</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The Draft EIS discusses potential impacts from spills (an unplanned event) on the marine and estuarine environment in Section 7.4.3. Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessels, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch07-210	Anji Ringzin	<p>We live on Orcas Island, and are concerned about the toxicity that Xylene would add to our waters.</p>	<p>Human and animal exposure to xylenes or reformate can result in toxic effects if concentrations are sufficiently high (see Section 9.6.2.1 of the Draft EIS). Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The toxicity of xylenes and reformate to animals and humans from potential exposure during operation of the</p>

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			<p>proposed project and in the event of a spill was analyzed in the Draft EIS. A discussion of the toxicity of xylene (and reformate) to animals and humans is discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Measures that would be taken to protect marine life and water quality are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls to prevent a spill at the refinery – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Wildlife and marine life – Sections 6.4 and 7.4 • Water quality – Chapter 5 and Section 7.4 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS and information regarding short-term versus long-term exposures to mixed xylene or reformate is provided in Section 3.6.2 of this Final EIS.</p>
Ch07-211	Kara Kukovich	I used to live on Orcas Island and do not want to see the beautifully rich and unique ecosystem of the Salish Sea harmed in any way.	Thank you for your comment.
Ch07-212	Maradel Gale	Our Puget Sound and the Salish Sea are already suffering from too much pollution and too many tankers passing through it.	Thank you for your comment.

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Ch07-213	Janice Bultmann	I grew up in Bellingham and spent many of my early years in the treasure of the Salish Sea and the waters around the San Juans. These are unique and precious places that deserve our most stringent and careful protections.	Thank you for your comment.
Ch07-214	Nancy Jacobs	Our Salish Sea is precious and must be protected.	Thank you for your comment.
Ch07-215	Karen Jarvis	Please be responsible stewards of the Salish Sea	Thank you for your comment.
Ch07-216	V Mangum	This could destroy our coastline in Washington!	Thank you for your comment.
Ch07-217	Katherine Jensen	I live well south and west of Anacortes, but I live on the Salish Sea. This project could create a disaster that would impact my immediate neighborhood as well as any other on the shores of this precious resource.	Thank you for your comment.
Ch07-218	Ruth MacGinitie	We have lived much of our lives here on the Salish Sea. Degradation of its unique beauty would be an inestimable loss for us, our family, and for our entire community.	Thank you for your comment.
Ch07-219	Barbara Sjöholm	You have already heard I imagine from people with scientific backgrounds about this hazardous substance and the possibility of its effects on our fragile ecosystem. I want to add my voice as a citizen who lives by the water and has significant concerns about Tesoro's actions.	Thank you for your comment.
Ch07-220	Liisa Wale	Please remember that this expansion affects anyone that lives near the Salish Sea of Western Washington and into British Columbia.	Thank you for your comment.
Ch07-221	Jean Schwinberg	This project is dangerous from the standpoint of water quality.	Thank you for your comment.
Ch07-222	Jennifer Rhyne	The waterways of the Pacific Northwest are a treasure. Approval of the Tesoro Refinery's expansion could put this crown jewel in jeopardy. Please protect our local environment.	Thank you for your comment.

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Ch07-223	Eric Nylen	The Salish Sea needs to be protected!	Thank you for your comment.
Ch07-224	Judy Fore	Our seas are too important to allow such risky and unnecessary practices without proper precautions. Please plan wisely.	Thank you for your comment.
Ch07-225	Arlene Roth	The last thing we need is toxic petrochemicals on our waters!	Thank you for your comment.
Ch07-226	Gena DiLabio	Please do not allow our waters to become a toxic petrochemical highway which may poison our Salish Sea.	Thank you for your comment.
Ch07-227	Deborah Colotti	Now is NOT the time to consider adding more petrochemical industries to expand, most especially into our waterways and fish breeding grounds.	Thank you for your comment.
Ch07-228	Denise Breton	Knowing the impact of this industry on waterways, I ask you to bring the highest standards and practices to this EIS, as your assessment will affect generations to come.	Thank you for your comment.
Ch07-229	Elsie Wattson Lamb	I personally feel it should not be permitted at all, believing that it would further compound all the potentially damaging events that we have placed on these waters, already.	Thank you for your comment.
Ch07-230	Naomi Bunis	It is imperative that we steward our beautiful Salish Sea and all that live in it.	Thank you for your comment.
Ch07-231	Theodora Tsongas	Allowing a known unreliable company to propose a project which threatens the Salish Sea is reckless and will result in permanent harm to the local and regional community and its resources. It also will harm the planet.	Thank you for your comment.
Ch07-232	Mary Leon	I do not want to see these beautiful waters of the Salish Sea become polluted, poisoned and permanently fenced in, due to big oil interests of profits.	Thank you for your comment.
Ch07-233	Cheryl E	THE WATERS BELONG TO ALL THAT WOULD INHABIT IT AND DERIVE A LIVING, A RIGHT TO BE FREE OF AND FROM	Thank you for your comment.

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		DESTRUCTIVE FORCES.	
Ch07-234	LeeAnn Chastain	This region is sensitive, and is now facing the very large challenge of trying to return the salmon runs to their former levels. Salmon are a major food source for orca whales and other marine mammals and large birds in this region. Increasing large vessel traffic and air and water pollution at Tesoro in Anacortes will not support that effort.	Thank you for your comment.
Ch07-235	Phyllis Dolph	<p>Padilla Bay Marine Estuary must be protected by the EIS. Significant loss of eelgrass and of herring spawning habitat has occurred in the adjacent Fidalgo Bay, primarily from dredging and filling of the shoreline areas (Williams et al 2003). Because of these losses and the uncertainty regarding factors limiting the Fidalgo Bay herring population, the WDFW considers the protection of herring spawning habitat to be a critical resource issue in Fidalgo Bay (DNR 1999).</p> <p>Juvenile chum (<i>Oncorhynchus keta</i>) and Chinook salmon (<i>O. tshawytscha</i>) are known to occur in Fidalgo Bay during spring out-migrations (Beamer In review, Washington DNR technical memo 2007).</p> <p>Fidalgo Bay is part of a proposed critical habitat for E&TS coastal bull trout (Federal Register, 2005b).</p> <p>Three species of forage fish—Pacific herring (E&TS) (<i>Clupea pallasi</i>), surf smelt (<i>Hypomesus pretiosus</i>) and Pacific sand lance (<i>Ammodytes hexapterus</i>)—use intertidal and shallow subtidal areas in Fidalgo Bay for spawning habitat (Appendix A, Figure 8) and constitute a major portion of the diets of salmon, seabirds, marine mammals, and other fish.</p>	The Draft EIS discusses potential impacts on forage fish, forage fish spawning habitat, and Pacific salmon and salmonids (including chum, chinook, and bull trout) in Section 7.4.
Ch07-236	Phyllis Dolph	<p>Invertebrates such as marine worms, snails, clams, crabs, shrimp and other crustaceans provide vital links in the Fidalgo Bay food chain. These primary consumers help support the local populations of birds, fish and mammals.</p> <p>The Olympia oyster (E&TS) (<i>Ostrea conchaphila</i>) is a native oyster once found at scattered sites throughout Puget Sound. Shells of</p>	The Draft EIS discusses potential impacts on invertebrates (including the Olympia oyster) in Section 7.4.

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		Olympia oysters have been found in Fidalgo Bay area beaches suggesting that this species once may have been found in the bay.	
Ch07-237	Pilchuck Audubon Society, Allen Gibbs	Our concerns apply also to the forage fish, which are important food sources for the aforementioned birds [herons], and also for anadromous fish and various marine mammals which traverse the vast Salish Sea.	<p>Potential impacts to forage fish are discussed in the following sections and tables of the Draft EIS:</p> <ul style="list-style-type: none"> • Herring spawning beds, surf smelt, Pacific sand lance, and Pacific herring – Table 7-3 • Forage fish habitat – Section 7.3.3.4 • Marine vessel wakes – Section 7.4.2.3 <p>Potential impacts to anadromous fish and marine mammals are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Fish – Section 7.3.2 • Other fish – Section 7.3.3.8 • Orca whales during operations – Section 7.4.2 • Orca whales during construction – Section 7.4.1 <p>Measures that are being taken to protect marine mammals, including orcas, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.1 and Table 7-1 • Vessel safety and waterway management, including environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures – Section 13.4.1.2 <p>See Section 3.5 of this Final EIS for further information regarding marine and nearshore resources. Additional information regarding agencies responsible for regulating listed species and marine and nearshore resources is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch07-238	Camille Meehan	Also, how will Xylene and increased vessel traffic affect salmon and other fisheries including shell fish beds.	Potential impacts on marine wildlife, including salmon and other fish, in the event of a spill are discussed in Section 7.4.3 of the Draft EIS.
Ch07-239	Jennifer Reznick	I eat a lot of salmon and I don't want the fish there killed by oil	Thank you for your comment.

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		industry pollution.	
Ch07-240	Ruth Anthony-Gardner	I depend upon wild salmon, which I eat every day as part of my low-inflammation diabetic diet, which would be at risk . This project directly threatens my health.	Thank you for your comment.

Chapter 9: Environmental Health

ID	Contact	Comment Text	Response
Ch09-001	James MacRae	The site is located close to the water, so this presents another issue: tank leakage over time and the possibility of explosions, which would pollute the immediate and adjacent areas.	<p>The proposed xylene storage and piping systems were designed to include secondary containment around all tanks, so that tank leaks would be contained (see Section 2.8.5 of the Draft EIS). Leak detection systems for all tanks and piping would alert workers in the event of a spill. The system was designed such that leaks from tanks would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's wastewater treatment plant. If the containment failed or a spill occurred outside of containment, response measures would be implemented to control the spill to prevent impacts to the adjacent areas. The refinery's SPCC Plans would be modified to accommodate the proposed project. Requirements for the safe handling and storage of petroleum products at the refinery are administered by the Washington State Department of Ecology and U.S. Environmental Protection Agency. Additional information regarding agencies responsible for regulating the safe handling, storage, and pollution prevention for xylenes is provided in Table 2 in Section 3.1 of this Final EIS. Further details about spill prevention and response measures at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Potential impacts on geological resources (including soil erosion) – Section 3.3.2 • Freshwater resources, including surface water, groundwater, and wetlands – Sections 5.3.2.3, 5.4.2.3, and 5.5.2.3, respectively • Potential impacts of unplanned events, including explosions – Section 9.6 • Process safety management program, preventive measures and inspections and oil spill response – Appendix 2-A
Ch09-002	Janet Alderton	I live on the shoreline of Orcas Island in the San Juan Archipelago. Tankers travel past the San Juan Islands through narrow and	The reformate mix Tesoro plans on using includes xylenes as well as other aromatic chemicals such as toluene, trimethylbenzene,

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		<p>hazardous marine passages. I have asthma and am very sensitive to volatile organic chemicals. A large spill of reformat or mixed xylenes as a result of vessel collision, allision or grounding would adversely affect me and many others. The benzene content of reformat makes it carcinogenic. Benzene is highly carcinogenic and is a threat to first responders to a spill as well as to residents in the area of a spill.</p> <p>The Draft E.I.S. states, “The worst-case spill from either reformat, reformat backhaul (a byproduct material) from the ARU after xylenes have been removed, or mixed xylenes would release large quantities of VOC hazardous air pollutants (HAPs), specifically mixed xylene isomers, toluene, ethylbenzene, and isopropylbenzene. The ASIL concentrations for these VOCs would be exceeded for up to 24 hours, based on the results of the modeling, and would be a potentially significant impact.”</p>	<p>and ethylbenzene, octane, and isopropyl benzene (see Table 2-1 and Appendix 13-A of the Draft EIS). Benzene is not a component of the reformat mix. Xylene is not regulated as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene and, in addition to these impacts, it may be carcinogenic in humans. The toxicity of xylene (and reformat) to humans is discussed in Section 9.6.2.1 of the Draft EIS.</p> <p>The likelihood and potential impacts associated with a marine spill and toxic releases are discussed in Section 13.5 of the Draft EIS. Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 • If a spill were to occur, the potential health impacts are discussed in Section 9.6.2 of the Draft EIS. <p>Additional information regarding potential impacts on environmental health in the event of a spill is provided in Section 3.6 of this Final EIS.</p>
Ch09-003	Phyllis Dolph	<p>Because xylene is less dense, human and animals are particularly prone to being impacted by a xylene spill on land or in the Salish Sea. The main health effects of inhaling xylene is depression of the central nervous system, with symptoms including headache, dizziness, nausea and vomiting. Long-term exposure may lead to short-term memory loss, among other effects.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as discussed in Section 9.6.2.1 of the Draft EIS.</p> <p>Potential impacts of unplanned events (including fires, explosions, and spills) and controls to prevent and minimize unplanned events are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5

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			<ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Impacts on terrestrial vegetation and wildlife from fire or explosion – Section 6.4.3 • Impacts on human health from air emissions – Section 9.3.2 • Impacts on human health from fire or explosion – Section 9.6.1 • Impacts on human health from spills – Section 9.3.2 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding potential impacts to environmental health and marine and nearshore resources, including wildlife, in the event of a spill is provided in Sections 3.6.2 and 3.5.2 of this Final EIS. Additional information regarding agencies responsible for protecting human health and wildlife is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-004	Ross Reid	I oppose this development for several reasons, the most prominent being the threat it poses to the health of future Washingtonians. Xylene is a risky substance and in the event of a spill, our residents will be feeling the effects of it for years due to its potency and difficulty in cleanup.	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes.</p> <p>The toxicity of xylenes to humans during potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. A discussion of the toxicity of xylene (and reformate) to humans is discussed in the following sections:</p> <ul style="list-style-type: none"> • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding potential impacts on environmental health in the event of a spill is provided in Section 3.6 of this Final EIS.</p>

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Ch09-005	Anne Elkins	<p>The seven page MSDS on Mixed Xylenes (http://www.ppci.com.ph/msds2k10/17_xylene.pdf) is not reassuring on health hazards, toxicity, ecological information, storage or disposal. The HAZARDS IDENTIFICATION section states:</p> <p>Flammable liquid and vapor! Harmful if swallowed or inhaled. Cause irritation to eyes and respiratory tract. Affects central nervous system. At high concentration, it is harmful if absorbed through skin and may also cause irritation. Inhalation of vapors irritates upper respiratory tract. Severe exposure may include fatigue, confusion, headache, dizziness and drowsiness. Exposure to high concentrations has anesthetic effect and central nervous system depressants.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes in Chapter 9. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS.</p> <p>Additional information regarding environmental health and xylenes is provided in Section 3.6 of this Final EIS.</p>
Ch09-006	Elizabeth Scholze	<p>Certainly, workers may be at the greatest risk, but this does not preclude risk to this community, especially in the event of a catastrophic fire or explosion. When these fires occur, they typically are very hard to put out, and are a risk to the first responders as well as to the general community.</p>	<p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-007	Carole Huffman	<p>Producing a potentially dangerous chemical in a valley is extremely dangerous. Should there be an accident, and no one can be sure there will not be an accident, could result in exposing thousands who live in the valley to dangerous toxins.</p>	<p>The proposed project is located on the northern half of the March Point peninsula east of the city of Anacortes in Skagit County. Potential impacts from unplanned events (including fires, explosions, and spills) and measures to prevent and minimize unplanned events are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts on terrestrial vegetation and wildlife from

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			<p>fire or explosion – Section 6.4.3</p> <ul style="list-style-type: none"> • Potential impacts on human health from air emissions – Section 9.3.2 • Potential impacts on human health from fire or explosion – Section 9.6.1 • Potential impacts on human health from spills – Section 9.3.2 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The LEPC, implemented by EPCRA, manages community safety by working in coordination with the refinery to oversee their emergency response program. Additional information regarding the agencies responsible for regulating community safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-008	Anne Elkins	<p>There is a glaring deficiency in the DEIS for the Tesoro Anacortes Clean Products Upgrade project. In none of the materials that were presented at the open house in Anacortes was the extreme danger of plant explosions mentioned. I believe that the residents of Anacortes have a right to know that xylenes is not as harmless, “clean” a product as Tesoro is portraying it. China has cancelled plans for several proposed xylene plants since the explosion at the Dragon Aromatics plant in Fujian province, April, 2015.</p> <p>(http://www.abc.net.au/news/2015-04-07/explosion-at-china-chemical-plant-injures-fourteen/6375112)</p> <p>(https://ejatlas.org/conflict/explosions-at-paraxylene-px-petchem-plant-and-the-related-protests-zhangzhou-fujian)</p> <p>(http://www.bbc.com/news/world-asia-china-32196103)</p>	<p>Impacts on health and safety from fires and explosions associated with transport and management of additional materials such as xylene at the refinery during construction and operation are discussed in Section 9.6 of the Draft EIS. Xylenes have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS). With regards to the production and transport of xylenes, the refinery has systems in place to properly handle these types of chemicals, prevent releases, control worker and community exposures, and respond to incidents (see Appendix 2-A of the Draft EIS).</p> <p>The refinery’s past safety history and measures that have been implemented to address past safety issues, including fires, explosions, and spills, are discussed in the Draft EIS. Additional information is provided in Section 3.6 of this Final EIS.</p> <p>An explosion did occur at a paraxylene plant in China on April 7, 2015. The root cause for this incident was determined to be related to poor safety procedures and oversight. The explosion discussed in the referenced articles was determined to be caused by a leak of paraxylene that occurred as a result of poor welds. In contrast to the China facility, the refinery must follow industry standards and legal requirements to confirm the integrity of welds and conduct routine pressure testing for safety.</p>

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			Specifically, Tesoro maintains a certificate of inspection by the Washington State Department of Labor and Industries for all pressure vessel testing and inspections and has certified National Board inspectors on site. The refinery also maintains certified welders, inspectors, and metallurgy personnel.
Ch09-009	Anne Elkins	<p>Perhaps this is the reason for Tesoro’s desire to export xylene: there is now a market in China because they have decided it is too dangerous to manufacture. Here are some of the many sources I easily found which discuss the dangers of xylene production:</p> <p>AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY https://www.atsdr.cdc.gov/mmg/mmg.asp?id=291&tid=53</p> <p>Is xylene flammable?</p> <p>Persons whose clothing or skin is contaminated with liquid xylene can cause secondary contamination by direct contact or through off-gassing vapor. Xylene is a clear, colorless liquid. It is volatile, readily producing flammable and toxic concentrations at room temperature. Oct 21, 2014</p> <p>NEW JERSEY DEPARTMENT OF HEALTH – HAZARDOUS SUBSTANCE FACT SHEET http://nj.gov/health/eoh/rtkweb/documents/fs/2014.pdf</p> <p>Fire Hazards</p> <p>If employees are expected to fight fires, they must be trained and equipped as stated in the OSHA Fire Brigades Standard (29 CFR 1910.156).</p> <p>Xylenes are FLAMMABLE LIQUIDS</p> <p>Use dry chemical, CO₂, water spray or foam as extinguishing agents.</p> <p>POISONOUS GASES ARE PRODUCED IN FIRE.</p> <p>CONTAINERS MAY EXPLODE IN FIRE.</p> <p>Use water spray to keep fire-exposed containers cool.</p>	<p>There is opposition to construction of new xylene facilities in China. The opposition is related to poor safety practices and safety histories of these facilities in China, displacement of local residents, and air emissions among other issues. Safety practices and regulatory oversight in the U.S. are much more robust and the proposed project would not result in the displacement of any local residents. Specifically, Tesoro maintains a certificate of inspection by the Washington State Department of Labor and Industries for all pressure vessel testing and inspections and has certified National Board inspectors on site. The refinery also maintains certified welders, inspectors, and metallurgy personnel. Employee training along with a process safety management program is discussed in Appendix 2-A of the Draft EIS.</p> <p>Xylenes are flammable and have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS), and gasoline is currently produced at the refinery. Potential impacts from unplanned events (including fires, explosions, and spills) and control measures to prevent and minimize unplanned events are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts on terrestrial vegetation and wildlife from fire or explosion – Section 6.4.3 • Potential impacts on human health from air emissions – Section 9.3.2 • Potential impacts on human health from fire or explosion –

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		<p>Vapors are heavier than air and may travel a distance to cause a fire or explosion far from the source and flash back.</p> <p>Flow or agitation may generate electrostatic charges.</p> <p>Xylenes may form an ignitable vapor/air mixture in closed tanks or container</p> <p>Spills and Emergencies</p> <p>If employees are required to clean up spills, they must be properly trained and equipped. The OSHA Hazardous Waste Operations and Emergency Response Standard (29 CFR 1910.120) may apply.</p> <p>If Xylenes are spilled or leaked, take the following steps:</p> <p>Evacuate personnel and secure and control entrance to the area.</p> <p>Eliminate all ignition sources.</p> <p>Absorb liquids in dry sand, earth, or a similar material and place into sealed containers for disposal.</p> <p>Keep Xylenes out of confined spaces, such as sewers, because of the possibility of an explosion. (emphasis mine)</p> <p>Ventilate area of spill or leak.</p> <p>DO NOT wash into sewer.</p> <p>It may be necessary to contain and dispose of Xylenes as a HAZARDOUS WASTE. Contact your state Department of Environmental Protection (DEP) or your regional office of the federal Environmental Protection Agency (EPA) for specific recommendations.</p> <p>CAMEO CHEMICALS CHEMICAL DATA SHEET XYLENE, [MIXED ISOMERS]</p> <p>https://cameochemicals.noaa.gov/chemical/8151</p> <p>Reactivity Alerts</p> <ul style="list-style-type: none"> • Highly Flammable <p>Air & Water Reactions</p>	<p>Section 9.6.1</p> <ul style="list-style-type: none"> • Potential impacts on human health from spills – Section 9.3.2 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel traffic, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>The refinery’s safety management plan in Appendix 2-A of the Draft EIS provides measures to eliminate the potential for explosions, among other safety requirements. The process safety management requirements noted in Appendix 2-A are required by the Washington State Department of Labor and Industries under the process safety management standard (WAC 296-67), and are not voluntary.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding xylene toxicity, safety considerations, and emergency planning is provided in Sections 3.6 and 3.7 of this Final EIS.</p> <p>The toxicity of xylenes to animals and humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. A discussion of the toxicity of xylene (and reformate) to animals and humans is included in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate on birds and aquatic species in the marine environments is provided in Section 3.5.2 of this Final EIS.</p>

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		<p>Flammable. Insoluble in water.</p> <p>Fire Hazard</p> <p>Excerpt from ERG Guide 130 [Flammable Liquids (Water-Immiscible / Noxious)]:</p> <p>HIGHLY FLAMMABLE: Will be easily ignited by heat, sparks or flames. Vapors may form explosive mixtures with air. Vapors may travel to source of ignition and flash back. Most vapors are heavier than air. They will spread along ground and collect in low or confined areas (sewers, basements, tanks). Vapor explosion hazard indoors, outdoors or in sewers. Those substances designated with a (P) may polymerize explosively when heated or involved in a fire. Runoff to sewer may create fire or explosion hazard. Containers may explode when heated. Many liquids are lighter than water. (ERG, 2016)</p> <p>Health Hazard</p> <p>Excerpt from ERG Guide 130 [Flammable Liquids (Water-Immiscible / Noxious)]:</p> <p>May cause toxic effects if inhaled or absorbed through skin. Inhalation or contact with material may irritate or burn skin and eyes. Fire will produce irritating, corrosive and/or toxic gases. Vapors may cause dizziness or suffocation. Runoff from fire control or dilution water may cause pollution. (ERG, 2016)</p> <p>Reactivity Profile</p> <p>XYLENE reacts exothermically with sulfuric acid, nitric acid, and strong oxidizing agents [Handling Chemicals Safely 1980. p. 962].</p> <p>I am angered by the lack of any mention of potential explosion danger at the public hearing at Anacortes High School on April 17, 2017. It was not mentioned in any of the printed materials. Not one of the proponents of the plant was honest about the potential dangers. The DEIS does not mention danger of explosion. The residents of Anacortes have a right to know that xylene is highly explosive, highly flammable and highly toxic.</p>	

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Ch09-010	Cathy Schoenberg	Who is going to clean up if there is an explosion? (taxpayer!!)	Responsible parties are required to incur the costs of the removal of released pollutants and provide compensation for the associated damages. Section 3.7.2 of this Final EIS details the regulatory requirements in the event of a spill, and these regulations would also apply to damage/pollution caused by an explosion resulting from a spill.
Ch09-011	Georgianna Morgan	2) there have been very horrible fires in pipelines carrying toxic oil, ?? etc. what preemptive measures are being taken to ensure community safety from any fire caused by leak or spill.	<p>Potential impacts on human health from unplanned events (including explosions, fires, and spills) are discussed in Section 9.6.1 of the Draft EIS.</p> <p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro’s safety improvements that have been made since the 2010 explosion are described in Appendix 2-A of the Draft EIS and the status of implementation of additional improvements to their process safety management program is provided in Section 3.6.3 of this Final EIS. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A (the process safety management requirements described in Appendix 2-A are required by the Washington State Department of Labor and Industries under the process safety management standard [WAC 296-67], and are not voluntary) • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating community health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-012	Joanna Idczak	The (widely scoped) aggregate and cumulative negative effects of permitting the xylene project is simply a gamble too risky. Allowing	An explosion did occur at a paraxylene plant in China on April 7, 2015. The root cause for this incident was determined to be

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		<p>the risks to sensitive areas and humans defies common sense from many aspects. Immediate and severe dangers would be present as well as long term harm. Ask the people from Zhangzhou, China, where three naphtha tanks exploded at a xylene plant on April 6th, 2015. Over 600 firefighters and a unit of their army battled the conflagration for three days. People 31 miles away felt the blast. That was the second explosion in two years at that plant. Mass protests in China over the toxicity and danger of the plants forced the shelving, delay and relocation of proposals. (BBC news)</p>	<p>related to poor safety procedures and oversight. The explosion discussed in the referenced articles was determined to be caused by a leak of paraxylene that occurred as a result of poor welds. In contrast to the China facility, the Tesoro Anacortes refinery must follow industry standards and legal requirements to confirm the integrity of welds and conduct routine pressure testing for safety. Specifically, Tesoro maintains a certificate of inspection by the Washington State Department of Labor and Industries for all pressure vessel testing and inspections and has certified National Board inspectors on site. The refinery also maintains certified welders, inspectors, and metallurgy personnel.</p>
Ch09-013	Ruth Holder, Phillip Holder	<p>Unsafe Workplace Also Endangers Community Health and the Natural Environment:</p> <p>By limiting the types of hazards analyzed in the manner described above, the DEIS also ignores the important role that workplace safety can play in protecting not only workers at the facility but also the health of surrounding communities and the natural environment. This also deprives decision makers and the public of a complete picture of the risks and consequences of the project. The DEIS discusses Process Safety Management elements in Appendix 2-A, but fails to make the connection between accidents resulting from ineffective Process Safety Management programs and significant adverse impacts to surrounding communities and the natural environment.</p> <p>Notably, in the CSB’s Report on the April 2, 2010 incident at Tesoro the CSB found that the causes of the incident at Tesoro were similar to one at a Chevron refinery in Richmond California in August 2012. 5 [CSB. Final Investigation Report Chevron Richmond Refinery Pipe Rupture and Fire. Report No. 2012-03-I-CA. January 2015. http://www.csb.gov/assets/1/16/Chevron_Final_Investigation_Report_2015-01-28.pdf. Accessed April, 2017. See also CSB. Chevron Richmond Refinery Fire video. April 2013. http://www.csb.gov/videos/chevron-richmond-refinery-fire-animation/. Accessed April, 2017.] The Chevron incident, like the one at Tesoro, was found to have resulted from an inadequate</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Worker health and safety is managed in accordance with WISHA and enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for worker and community health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS.</p> <p>Cumulative impacts from regular operations of surrounding industry were considered in the Draft EIS analyses (e.g., see cumulative air and water quality impacts in Sections 4.7, 4.8, and 5.6 of the Draft EIS). The potential for incidents at other locations unrelated to the proposed project is not included in the analysis, as the assumptions required to perform such an analysis would</p>

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		<p>PSM program. As in the case of Tesoro, maintenance and safety problems went uncorrected for years. The DEIS failed to consider or analyze the CSB Report for the Chevron incident even though it was discussed prominently in the CSB Report on the Tesoro matter. The Chevron Report is important and must not simply be included as a reference but must also be examined for changes needed in the Final EIS. It will provide a more complete picture of risks not only to refinery workers, but also to the surrounding communities and the natural environment in this permitting matter.</p> <p>While fortunately there were no fatalities at the Chevron Refinery, in that case a vapor cloud enveloped 19 refinery workers, including a refinery firefighter at the scene who was inside a fire engine that was caught within a fireball when process fluid ignited. He, as well as the other fire fighters, narrowly escaped injury or death. The safety breaches at Chevron also caused harm to the community and the environment. The "release, ignition, and subsequent burning of the hydrocarbon process fluid resulted in a large plume of vapor, particulates, and black smoke, which traveled across the surrounding area." CSB Report on Chevron Refinery, §3.3, Consequences. As a result, some 15,000 people from the surrounding communities sought medical treatment for breathing problems, chest pain, shortness of breath, sore throat, and headaches. 20 were hospitalized. In the case of Tesoro, not only would employees, contractors and the public in nearby communities be threatened by such incidents, but it is not hard to envision the impact on the natural environment of a vapor cloud wafting over Padilla Bay.</p> <p>In Skagit County, another incident must be taken into account in the FEIS for analyzing unplanned events involving ineffective safety procedures that impact nearby communities. On February 20, 2015, there was a release of uncombusted hydrogen sulfide, dimethyl sulfide, mercaptans, and benzene into the atmosphere from the Shell Puget Sound refinery flare line that carried the released chemicals south from the refinery through the Swinomish Reservation and the town of La Conner. 6[Preston, S. Northwest Clean Air Agency. Shell's Puget Sound Refinery Penalized for</p>	<p>be speculative.</p>

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		<p>Chemical Release. Nov. 16, 2016. http://nwcleanairwa.gov/news-release/shells-puget-sound-refinery-penalized-for-chemical-release/ Accessed April 2017.] As a result of the release of these materials, hundreds of people reported symptoms that included irritation of the eyes, throat and lungs, headaches, nausea, fatigue and loss of appetite. 12 people from the Swinomish Tribe sought medical treatment and 5 went to emergency rooms or area hospitals. Safety breaches, deleterious effects on community health, and environmental degradation are related phenomena; the DEIS approach of treating them as nonintersecting compartments is a poor analytical methodology. The Final EIS must also take these incidents into account and include surrounding communities and the natural environment in its examination of impacts in relation to the effectiveness of Tesoro’s PSM program.</p>	
Ch09-014	Jeffrey Jacobs	<p>Safety features for emergency response to a spill – either on land or in Puget Sound – are presently inadequate. Tesoro should pay for increased emergency response features. The toxicity of xylene if released into the air could be dangerous to residents of Anacortes, as well as to workers at the refinery, and also toxic to the environment if spilled into soil and thus leached into waterways.</p>	<p>Responsible parties are required to incur the costs of the removal of released pollutants and provide compensation for the associated damages. Section 3.7.2 of this Final EIS details the regulatory requirements in the event of a spill, and these regulations would also apply to damage/pollution caused by an explosion resulting from a spill. Section 13.5.7 of the Draft EIS describes emergency response procedures in the event of a worst case or maximum most probable spill. Spills in the marine environment would be responded to by the oil spill response organizations described in Section 13.5.7 of the Draft EIS. Multiple agencies and industries regularly engage in spill planning and spill response drills and maintain spill response equipment caches throughout Puget Sound (also described in Section 13.5.7 of the Draft EIS).</p> <p>The refinery maintains its own firefighting resources, including a trained fire response team, in addition to mutual aid agreements with industrial neighbors and other refineries to respond to petroleum fires or explosions. The Draft EIS discusses the availability of fire and emergency response services and potential impacts to them in the event of an unplanned event in Sections 11.4.1.2 and 11.4.2. Additional information regarding Tesoro’s emergency response planning and coordination with local</p>

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			<p>services is discussed in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Further details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating community safety and air emissions is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-015	Kathleen Lorence-Flanagan	8. Using emergency response teams from the refinery staff and public services of Skagit County seems woefully inadequate. In a 2nd (in 2 years) xylene plant explosion in Fujian province of China it took 3 days, 800 firefighters, and 170 fire engines to contain the fire. (It must be acknowledged they likely do not have the same environmental protection laws there, as we do here, yet it still speaks to the magnitude of resources that might be needed.)	<p>An explosion did occur at a paraxylene plant in China on April 7, 2015. The root cause for this incident was determined to be related to poor safety procedures and oversight. The explosion discussed in the referenced articles was determined to be caused by a leak of paraxylene that occurred as a result of poor welds. In contrast to the China facility, the Tesoro Anacortes refinery must follow industry standards and legal requirements to confirm the integrity of welds and conduct routine pressure testing for safety. Specifically, Tesoro maintains a certificate of inspection by the Washington State Department of Labor and Industries for all</p>

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			<p>pressure vessel testing and inspections and has certified National Board inspectors on site. The refinery also maintains certified welders, inspectors, and metallurgy personnel.</p> <p>The refinery maintains its own firefighting resources, including a trained fire response team, in addition to mutual aid agreements with industrial neighbors and other refineries to respond to petroleum fires or explosions. The Draft EIS discusses the availability of fire and emergency response services and potential impacts to them in the event of an unplanned event in Sections 11.4.1.2 and 11.4.2. Appendix 2-A discusses existing operations and controls, process safety management, preventive measures and inspections, and oil spill response in place at the refinery. Additional information regarding Tesoro’s emergency response planning and coordination with local services is provided in Section 3.7.1 of this Final EIS.</p> <p>The LEPC, implemented by EPCRA, manages community safety by working in coordination with the refinery to oversee their emergency response program. Additional information regarding the agencies responsible for regulating community safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-016	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for	The Xylenes Project also requires a new vessel for storing perchloroethylene.[DEIS 224] This chemical is dangerous: “Short term exposure to high levels of perchloroethylene can affect the central nervous system and cause unconsciousness and death.” [National Institutes of Health, U.S. National Library of Medicine, Tox Town website. Available online at https://toxtown.nlm.nih.gov/text_version/chemicals.php?id=22 . Last Accessed May 1 st , 2017.] It is listed as “reasonably anticipated to be a human carcinogen.” [National Institutes of Health, U.S. National Library of Medicine, Tox Town website. Available online at https://toxtown.nlm.nih.gov/text_version/chemicals.php?id=22 . Last Accessed May 1 st , 2017.] Impacts to personnel, public health, aquatic life, vegetation, and wildlife due to potential exposure to any these new chemicals has not been analyzed in the DEIS. What would happen in the event of a sudden burst, crack, or	<p>See Section 9.6 of the Draft EIS for a discussion of the potential health risks associated with perchloroethylene, which is already used at the refinery. Perchloroethylene would not be transported over water, but would be brought to the refinery via truck.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding coordination on emergency</p>

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	Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>spill of these chemicals?</p> <p>The FEIS must include a more thorough analysis of the risks of these chemicals as well as detailed mitigation measures that will be employed by Tesoro to limit these risks. In light of Tesoro's troublesome history, these measures should include mechanisms for public agency verification of their full implementation and efficacy.</p>	<p>response is included in Section 3.7.1 of this Final EIS.</p> <p>Information regarding the agencies responsible for worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-017	Sanford Olson	<p>Xylene is a highly volatile hazardous and toxic substance. The DEIS does not adequately address the significant adverse risks and impacts from the manufacture and export of xylene, nor the interaction of xylene with LNG and/or LPG should an accident occur between ships carrying two or more these highly volatile hazardous substances.</p>	<p>The toxicity of xylenes and reformate to animals and humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Potential impacts of unplanned events and controls to prevent and minimize unplanned events are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Impacts on terrestrial vegetation and wildlife from fire or explosion – Section 6.4.3 • Impacts on human health from air emissions – Section 9.3.2 • Impacts on human health from fire or explosion – Section 9.6.1 • Impacts on human health from spills – Section 9.3.2 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel traffic , vessel safety and marine spills and spill

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			<p>response – Sections 13.3.2, 13.4.2, and 13.5</p> <p>The EIS does not attempt to evaluate the impacts from an incident between two ships carrying various highly volatile hazardous substances. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). The numerous variables and uncertain probability of an incident of this type would require significant assumptions resulting in a speculative analysis that would not result in useful information for agency officials.</p> <p>Vessel transits are regulated and controlled by the USCG Puget Sound VTS for the Salish Sea. Much like an airport traffic controller maintains clearance and positive control of aircraft at an airport, the USCG VTS maintains positive control of incoming and outgoing tankships and maintains navigational clearances, clearance from oncoming traffic, and safe distances from other vessels (see Section 13.3.1.1 of the Draft EIS).</p> <p>Additional information regarding the agencies responsible for marine vessels and human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-018	Sanford Olson	<p>Air Quality Impacts</p> <p>Chapter 9: Environmental Health, states that following a worst case or maximum most probable spill “evacuation and the establishment of an exclusion zone would be required to prevent acute health impacts.” The DEIS does not address how such an evacuation and/or the establishment of an exclusion zone would occur in order to protect our residents, visitors, and boaters.</p> <p>San Juan County First Responder Safety</p> <p>In San Juan County, the Islands Oil Spill Association our community oil spill response organization would participate in GRP deployment. IOSA staff and trained volunteers conduct GRP responses and drills in San Juan County The Oil Spill Response Organizations (OSROs) contract with IOSA to provide the 2 and 3-hour Planning Standards for the San Juan County.</p> <p>The DEIS addresses GRPs, but not the safety of deploying first</p>	<p>Additional information regarding emergency response planning and coordination with local services is provided in Section 3.7.1 of this Final EIS. The local emergency planning committee, as required under the EPCRA, manages community safety by working in coordination with the refinery to oversee their emergency response program. Additional information regarding agencies responsible for regulating emergency response planning is provided in Table 2 of Section 3.1 of this Final EIS.</p> <p>Details about coordination and training of Tesoro and local emergency service providers are discussed in Section 11.4 of the Draft EIS. Section 13.5.7 of the Draft EIS describes emergency response procedures in the event of a worst case or maximum most probable spill. Spills in the marine environment would be responded to by the oil spill response organizations described in Section 13.5.7 of the Draft EIS. Workers for these organizations would be trained and equipped as required by Washington State</p>

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		<p>responders. The DEIS addresses worker safety, but not the safety of first responders. The need for respiratory protection and protective clothing prescribed by the chemical datasheet from NOAA, quoting the 2016 Emergency Response Guidebook (from the US Department of Transportation, Pipeline and Hazardous Materials Safety Administration) states that “positive pressure self-contained breathing apparatus (SCBA)” should be available to first responders and that structural firefighters' protective clothing provides only limited protection.</p> <p>Require the FEIS to address the safety of first responders who would respond to a spill, including appropriate respiratory protection and protective clothing.</p>	<p>Department of Labor and Industries, which regulates all aspects of worker health and safety. Trained first responders would have the necessary personal protective equipment and have the training to evaluate what equipment is required, depending on the spill situation. In addition, multiple agencies and industries regularly engage in spill planning and spill training drills.</p>
Ch09-019	Anne Elkins	<p>I am a resident of Anacortes, living approximately 2 miles (direct distance) from the Tesoro refinery--well within the area that would be impacted by fumes from a xylene plant fire, such as the one in China that took 2 days and approximately 600 firefighters to put out. The only viable route on or off Fidalgo Island for Anacortes traffic, Washington State Ferry traffic, and for traffic coming from Whidbey Island to get to Mt Vernon/Burlington or I-5, is Hwy 20. The intersection at March's Point is less than 1/2 mile from the refinery: an explosion and fire would severely impact the ability of residents of two islands, and ferry traffic, to get to work, get home, and travel for necessities. It would impact Whidbey Naval Air Station, as many of the military live in Anacortes, Mt. Vernon and Burlington.</p>	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. Measures to prevent or respond to unplanned events (including fires, explosions, and spills) are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel traffic, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular training drills. Additional information on emergency response coordination between the refinery and the local communities is provided in Section 3.7.1 of this Final EIS.</p>
Ch09-020	Howard Cherrington	<p>Require a full independent epidemiological study of the potential impacts of the accidental release or spillage of xylene in the waters</p>	<p>The Draft EIS describes the toxicity of xylenes to humans (Section 9.6), marine birds (Section 6.4.3.3), and aquatic life (Section</p>

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		of the Salish sea and the additional impacts on humans who may come in contact with such spillage;	7.4.3.2). Additional information regarding xylene toxicity to humans and aquatic species is provided in Sections 3.6.1 and 3.5.2 of this Final EIS.
Ch09-021	Lael White	The draft EIS falls short on key measures including... potential for spills, explosions, and local devastation.	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. Measures to prevent or respond to unplanned events (including fires, explosions, and spills) are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel traffic, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5
Ch09-022	Jacob R Raitt	Basically, if xylene encounters even the smallest of flames, the fireball and explosion will be monumental. I know, as I was involved in such an explosion and column of flame some years ago.	Xylenes have a similar flammability to gasoline, already in production at the refinery (see Section 9.6.1 of the Draft EIS). The refinery has systems in place designed to properly handle flammable materials (including xylenes), prevent releases, control worker and community exposures, and respond to incidents.
Ch09-023	Olga Kachook	Xylene is dangerous to public health. Short-term exposure to xylene is known to cause difficulty breathing, impaired memory, and delayed response to visual stimulus, among other issues.	<p>Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 and impacts to human health from air emissions are discussed in Section 9.3.2.2 of the Draft EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety

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			<p>management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A</p> <ul style="list-style-type: none"> • Potential impacts from unplanned events, including fires, explosions and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding potential impacts on environmental health in the event of a spill is provided in Section 3.6.2 of this Final EIS. Additional information regarding agencies responsible for protecting human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-024	Anonymous	And we've already experienced some of the refinery's gassing of us, gotten sick from it before, and don't look forward to any more in the future.	<p>The refinery's safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or

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			<p>reformate into the marine environment – Section 13.5.7</p> <ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for protecting worker and human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-025	Steve Knutsen	<p>Tesoro and Shell have spill and venting accidents all the time. The last one luckily drifted south, if it had come over Anacortes , a great many more people would have ended up at Hospital. Those who were hospitalized, or stayed , sick , at home, were not comforted by refinery comments that the venting was no big deal. These accidents happen, and I am greatly concerned about xylene, a nerve toxin, getting loose in our community.</p>	<p>The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 and impacts to human health from air emissions is discussed in Section 9.3.2.2 of the Draft EIS.</p> <p>The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding potential impacts on environmental health in the event of a spill is provided in Section 3.6 of this Final EIS. Additional information regarding agencies responsible for protecting worker and human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-026	Jeremy Bosworth	<p>Secondly, I was gassed out of my shop during the flare cleaning/sour gas release a couple years back and had to flee with my OGVapor respirator. I was shocked to call Shell/Tesoro and find</p>	<p>The referenced release event was from the Shell Refinery and exposed both workers and the public to toxic emissions from the uncombusted flare gases. Skagit County does offer an emergency</p>

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		<p>active misrepresentation/obfuscation from the several people I talked to at the front gates. Furthermore shocked that there was no reverse 911/ amber style alert system in place for alerting the community for accidental releases. This should absolutely be demanded of the refineries by the county!!! Especially in the light of the installation of large scale storage facilities and transport of Xylene! Borderline perimeter active monitoring of all VOC's should be Mandatory for the safety and long term exposure to the community.</p> <p>My experience with Xylene is somewhat personal. In my first year at the Evergreen State College, I took a printmaking class. The professor/artist who ran the print shop had been there for 30 years and due to poor ventilation and exposure to Xylene in particular had a severe degenerative neurological condition, used a powered wheel chair and died 3 years later, my senior year.... obviously this was a unique case, with direct long term exposure, but my concern for myself & the people in this community is with the slow, chronic, low level exposure to Xylene & Benzene notably, and to all the other highly reactive Volatile Organic Compounds released by the refineries. VOC's burn/oxidize because of their chemistry. When we breathe in unburnt VOC's they react with the tissues in our lungs. Tesoro and Shell should be absolutely required to monitor and alert/inform us of any and all releases from their refineries. Oil refining is the most profitable business in history, there is simply no reason, no defensible position, for them not to install this.</p>	<p>alert system. For further information and to sign up to receive alerts go to:</p> <p>http://public.alertsense.com/SignUp/?regionID=1166</p> <p>The USEPA requires the refineries to monitor for benzene as a surrogate toxic compound starting in 2018. Fence line benzene monitors have been installed at the Tesoro Anacortes Refinery and a pilot project has been performed. The NWCAA will have responsibility for ensuring the correct operation of that monitoring program. This proposed project would not increase benzene sources within the refinery but would increase other toxic compounds like xylene, ethylbenzene, and toluene.</p> <p>The air modeling analysis presented in Section 4.4.2.1 of the Draft EIS found that the proposed project would not result in exceedances of air pollutant concentrations above the existing air quality standards within the air shed for normal operations. ASILs are health-based risk concentrations for toxic chemicals and are determined by the Washington State Department of Ecology. See WAC 173-496 for the list of toxic chemicals and their ASILs. See Table 4.10 of the Draft EIS for the toxic modeling results and comparison to each applicable ASIL.</p> <p>The current odors coming from the refineries are not part of the proposed project. However, existing refinery emissions are included in the ambient background concentrations for the region as used in the analysis of air quality impacts (see Table 4-9 of the Draft EIS). Project-related emission increases plus the ambient background concentrations demonstrate compliance with applicable air quality standards (see Section 4.4.2.1 of the Draft EIS). Odors are monitored by the NWCAA and if applicable, excess emission violations are then determined. Additional information regarding the agencies responsible for regulating emissions and odors from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-027	Cathy Schoenberg	Any air exposure would be threatening to life forms, including human, especially pregnant women.	Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the

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			<p>following sections:</p> <ul style="list-style-type: none"> • Terrestrial plants and wildlife, including marine birds – Section 6.4 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 <p>Additional information on the toxicity of xylene and reformato to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information on the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Emissions from new or modified sources at the facility are subject to regulations and permitting requirements under the authority of the NWCAA or Ecology. Additional information on proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Additional information regarding the agencies responsible for regulating the air emissions is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-028	Annabelle Fox	<p>Countless times, when traveling in the refinery area, the odor of emitted vapors are evident. We don't need to inhale any more added vapors from the xylene that can't be contained. I suffer on those days with nasal pain and headache when I'm inside my car. What about all the people, birds, and animals in the area that are exposed to that all day?</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high. The Draft EIS analyzed the toxicity of xylene (and reformato) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 <p>Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS).</p> <p>The current odors coming from the refineries are not part of the proposed project. However, existing refinery emissions are included in the ambient background concentrations for the region as used in the analysis of air quality impacts (see Table 4-9 of the Draft EIS). Project-related emission increases plus the</p>

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			<p>ambient background concentrations demonstrate compliance with applicable air quality standards (see Section 4.4.2.1 of the Draft EIS).</p> <p>Emissions from new or modified sources at the facility are subject to regulations and permitting requirements under the authority of the NWCAA or Ecology. Additional information on proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Additional information regarding the agencies responsible for regulating the piloting of vessels, air emissions, and odors is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-029	Evie Opp	<p>I recently watched my best friend die of pancreatic cancer. As a healthy young woman with a new baby and no family history of illness, the stage IV diagnosis was a complete shock to the entire community. As she began treatment in Anacortes, nearly everyone she met in the cancer ward had worked at the refinery or lived very close to it. She was convinced that breathing the air from the refineries for 10-12 years was the cause.</p> <p>Of course, the plausible deniability is quite convenient for Tesoro. We overlook so many shoddy practices for the sake of jobs. Let's hold Tesoro accountable for the huge health and environmental cost that this community bears.</p>	Thank you for your comment.
Ch09-030	Louise M Key	This is just nuts to allow any company to poison the air with a neurotoxin that causes serious damage to the human body. All organs are affected. Little people even more so. And for what? Profit for a company???	Thank you for your comment.
Ch09-031	Carole Huffman	Twice I have driven past the current Tesoro facility and seen bright green and another time bright orange clouds coming from the refinery. I have no idea what was in the clouds, but the wind was blowing so thankfully much of the smoke plumes moved away from the community. Had the wind not been blowing it would have settled on the homes. A neurotoxin explosion, from the proposed Tesoro facility, could blanket, not just Anacortes, but the entire Skagit valley with poisons.	Thank you for your comment.

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Ch09-032	Veronica Nelson	I live in La Conner and was personally affected by a leak that occurred there a year or two ago. Many residents, including myself, received headaches and dizziness. A elderly man and baby had respiratory issues and had to go to the hospital. The refinery said their meters showed no damage but we could smell it in La Conner. Swiinomish had it worse.	Thank you for your comment.
Ch09-033	Elizabeth Heath	I spent about two hours near the refinery last May. Because of the irritation to my eyes and throat and increased difficulty breathing, I had to leave. I do not have any existing poor health conditions in those areas.	Thank you for your comment.
Ch09-034	Sue O'Donnell	<p>My husband & I live across Fidalgo Bay from the 2 Anacortes refineries. We bought our house from a friend who died of leukemia. When she became ill, she suspected the chemicals in the air had contributed.</p> <p>We have begun keeping track of the very unpleasant smells coming from the refineries, especially on windy days. We want to know the days of the week and the hours of the day when the smell is the worst. I intend to call the EPA and find out what they know about these escaping smells from the refineries. We worry not just for our neighborhood, but for all others in the Anacortes area.</p>	Thank you for your comment.
Ch09-035	Judy Hammer	This is from a data scientist at the U.S. Department of Energy, Oak Ridge National Laboratory. He developed a data tool on the internet that supplies researchers with an advanced tool for literature-based discovery, that has the potential to accelerate medical research and discovery. Quote, Semantic MEDLINE -- the program -- is kind of like having a research assistant who looks at a ton of articles and organizes them for you. Here's what came up. When we threw the EPA's top ten carcinogens at Origami -- which is the software program -- we noticed there were few elements that appear over and over its connecting links. Some of these elements made sense from a reasoning point of view, but there was one that we had never seen before. The surprising connection with xylene -- a common solvent used in printing, rubber, paint,	A discussion on the potential carcinogenicity of xylenes and short-term versus long-term exposures have been added to Section 3.6 of this Final EIS in. Under normal operating conditions, there would not be xylene emissions to the air at concentrations greater than the applicable regulatory levels. Emissions in the event of a spill could exceed regulatory levels for a short time (less than one day) and spill responders are trained and protected (see Section 9.6 of the Draft EIS).

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		<p>leather industries -- past EPA studies focused on xylene as a potential carcinogen have proven inconclusive, but Origami's results suggest the further inquiry. Using publicly available health-related data sets in an advanced webcrawler called I-crawl, Tesoro's team built profiles of xylene exposure for lung cancer patients and non-cancer patients, and compared the two. Quote, the people who had lung cancer had much larger and longer exposures to xylene than people without cancer. This is not confirmation that xylene causes cancer. In order to have confirmation, we need a carefully designed longitudinal cohort study. But this is one more red flag that we should be looking at xylene closely. So my point is, xylene causes health issues. And I think it's irresponsible to put this in our air without knowing more about it. And I'm hoping that the commissioners would take a look at that and consider that, because I agree with the young woman who spoke. Because if we don't have our health, we don't have anything. And everybody in here who's ever been sick understands that.</p>	
Ch09-036	Georgianna Morgan	<p>4) what toxic chemical vapors might be released into the atmosphere and how does that compare to ppm/person that is safe....</p>	<p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and the Washington State Department of Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>Impacts on human health from air emissions, including VOCs that are categorized under the toxic air pollutant category, are discussed in Section 9.3.2 of the Draft EIS.</p> <p>Additional information regarding the agencies responsible for regulating air emissions and human health is provided in Table 2</p>

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			in Section 3.1 of this Final EIS.
Ch09-037	Richard Broderick	I am strongly against giving Tesoro a permit to construct a Xylene plant which will make our air quality even worse than it is now because of the refinery. Xylene is the cause of many health issues including being a carcinogen.	<p>The toxicity of xylenes (and reformate) to humans is discussed in Section 9.6.2.1 and impacts to human health from air emissions are discussed in Section 9.3.2.2 of the Draft EIS. Xylene is not classified as a carcinogen by the USEPA in their Integrated Risk Information System database on toxic effects because the USEPA considers the strength of the data is not sufficient to demonstrate a link between cancer and xylene exposure. There is some scientific data indicating there may be a link between xylenes and cancer, and research is ongoing. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.</p> <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and the Washington State Department of Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>Additional information regarding agencies responsible for regulating air emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-038	Kenneth Bosworth	The refined by-products have given way to really toxic chemicals and while the refining process is working upon doing just that....they continue to overlook systems that could make a difference in the air we breath right here in Anacortes.	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the</p>

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			<p>authority of the NWCAA and the Washington State Department of Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>Additional information regarding the agencies responsible for regulating air emissions is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-039	Michael Devirian	A xylene spill would cause severe air quality impacts to our residents, visitors, boaters, first responders, and marine ecosystem.	<p>A large volume marine spill (worst case and maximum most probable spill volumes analyzed in the Draft EIS) has the potential to adversely affect humans and ecosystems. The measures in place to prevent spills and respond rapidly to spills should they occur are described in Chapter 13 of the Draft EIS. The proposed project does not significantly increase the risk of a marine spill (see Section 13.5 of the Draft EIS).</p> <p>Additional information regarding agencies responsible for regulating marine vessels, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS. Additional information regarding toxicity of xylenes to marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch09-040	Brooke Avery	The refinery is a polluter of this environment. I have been in LaConner when a nasty smell descended on the whole town. Nobody knew what it was, but we all knew it came from the refinery. God only knows what we were breathing in. My father died of cancer, as have many others I have known living in the valley. So many that I looked up the rates for cancer and found that Skagit County was higher than many others in Washington.	<p>Skagit County cancer incidence rates are discussed in Section 9.3.1.2 of the Draft EIS and the County rates were compared to Washington State as a whole. Skagit County is ranked as having the fourth highest total cancer incidence rate out of the 39 counties in the state; however, recent data indicate the cancer rate is falling in the County (National Cancer Institute Data for 2010-2014). Skagit County has a larger percentage of their population over 65 years of age than Washington State as a whole. While many complex factors contribute to cancer, cancer</p>

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			<p>is the second leading cause of death in the United States and an older population would have higher cancer rates, other factors being equal. Life style choices, age, and genetic factors can all contribute to causes of cancer in addition to environmental pollution.</p> <p>Xylene is not classified as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene. In addition to these impacts, ethylbenzene may be carcinogenic in humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.</p> <p>Additional information regarding agencies responsible for regulating air emissions and odors is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-041	Rebecca Durr, Greg Durr	In addition, it must be determined how the air quality would affect the health of people downwind during normal operation as well as in case of explosion or fire.	<p>All xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS).</p> <p>The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and the Washington State Department of Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>Xylenes have a similar flammability to gasoline, already in production at the refinery (see Section 9.6.1 of the Draft EIS). Potential impacts from unplanned events (including explosions</p>

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			<p>and fires) are discussed in Section 9.6 of the Draft EIS.</p> <p>Additional information regarding the agencies responsible for regulating air emissions and human health is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS.</p>
Ch09-042	Anonymous	<p>If they cared, Tesoro would have done this without being forced. (They got caught.) This is why Tesoro has to do the upgrades. With EPA being gutted under current president, we are scared. Xylene emissions will affect thousands for the benefit of a few. Let's find other companies to pursue as a community that will bring tax dollars to Skagit without the risk of damage to our health, eco-tourism, etc. We are not saying to shut down the refineries. We are begging you not to allow even more deadly fumes via xylene.</p> <p>[Tesoro and Par Clean Air Act Settlement - EPA web page copy]</p>	<p>All xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). Emissions from new or modified sources at the facility are subject to regulations and permitting requirements under the authority of the NWCAA or Ecology. Additional information regarding agencies responsible for regulating air emissions is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The toxicity of xylene to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding xylene exposure in humans is found in Section 3.6.2 of this Final EIS.</p>
Ch09-043	Evergreen Islands	<ul style="list-style-type: none"> • Is there release of toxic or hazardous materials from disturbance or excavation of contaminated soils or sediments located on the project site? 	<p>Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.</p>
Ch09-044	Anonymous	<p>[Handwritten notes on copy of CAA Pollutant Report for Tesoro Anacortes Refinery]</p> <p>Tesoro self reports. You have to pull this graph up online to see 2014 and 2015. Paper wasn't wide enough.</p> <p>-Total VOCs: 2013?</p> <p>-TRI Air Toxics: 167,105.00 WOW</p> <p>-TRI Ozone Precursors: 2013; 65,912.00!</p> <p>Just because certain "allowable amounts of emissions" are acceptable under the EPA, explain that to those of us who are getting sick.</p>	<p>Thank you for your comment.</p>

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		Please, no more emissions, especially of as something as toxic as xylene	
Ch09-045	Sanford Olson	<p>My concerns about the Project include the following:</p> <p>2. Our collective air quality. A xylene spill would cause severe air quality impacts to San Juan residents, visitors, first responders and the shared marine ecosystem.</p> <p>Having been a volunteer first responder with Islands Oil Spill Association (IOSA), I have grave concerns about the safety of any first responders to the extremely hazardous explosive and toxic nature of spilled xylene in the marine environment. The protective equipment and training required to ensure the safety of responders is not currently in the IOSA inventory or experience. IOSA has the 2 and 3 hour mandated response requirement in San Juan County.</p>	<p>Air quality in the event of a worst-case or maximum most probable spill would be impacted in the short-term until the products safely evaporate (up to one day before air concentrations would be below levels of concern).</p> <p>Section 13.5.7 of the Draft EIS describes emergency response procedures in the event of a worst case or maximum most probable spill. Spills in the marine environment would be responded to by the oil spill response organizations described in Section 13.5.7 of the Draft EIS. Workers for these organizations would be trained and equipped as required by Washington State Department of Labor and Industries, which regulates all aspects of worker health and safety. Trained first responders would have the necessary personal protective equipment and have the training to evaluate what equipment is required, depending on the spill situation. In addition, multiple agencies and industries regularly engage in spill planning and spill training drills.</p>
Ch09-046	Clara Cleve	<p>Then there if the clean air issue. The polutants cause serious illnesses.</p> <p>We need to put People & their health First!</p>	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and the Washington State Department of Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>Additional information regarding the agencies responsible for regulating air emissions and human health is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety</p>

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			considerations is provided in Section 3.6 of this Final EIS.
Ch09-047	Susan Woods	<p>There are always harmful emissions in its manufacture. Telling the community that it will be a minimum level and not harmful is inaccurate. The translation of such a statement to me is: "Here's your daily dose of poison." Nothing will be spared, not crops and soils, not humans, not our drinking water and not animals.</p> <p>Each time an industry that pollutes is built, promises are made about its safety and the safeguards of production. Those are always minimums. The plant gets to make their measure of pollution. Promises of safety are made for now and ongoing. Promises from industry are regularly broken.</p>	Thank you for your comment.
Ch09-048	Ronald Nichols	worker and public safety should be paramount as opposed to Tesoro's profits.	Thank you for your comment.
Ch09-049	Chelsea Blank	I also agree with the healthcare professionals who suggest that the EIS needs to analyze the risks of this project pertaining to refinery workers and the cancer rates in Skagit County.	<p>Skagit County cancer incidence rates are discussed in Section 9.3.1.2 of the Draft EIS and the County rates were compared to Washington State as a whole. Skagit County is ranked as having the fourth highest total cancer incidence rate out of the 39 counties in the state; however, recent data indicate the cancer rate is falling in the County (National Cancer Institute Data for 2010-2014). Skagit County has a larger percentage of their population over 65 years of age than Washington State as a whole. While many complex factors contribute to cancer, cancer is the second leading cause of death in the United States and an older population would have higher cancer rates, other factors being equal. Life style choices, age, and genetic factors, can all contribute to causes of cancer in addition to environmental pollution.</p> <p>Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.</p>
Ch09-050	Matthew Anderson	We should consider who will benefit if the xylene facility is denied. Workers will benefit from less sickness and disease associated with xylene. We, citizens, will benefit from less exposure to toxic chemicals. Children, in particular, will benefit, as their developing	Thank you for your comment.

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		bodies and brains are more vulnerable to air pollution.	
Ch09-051	Valerie Rose	Of course, the highest safety standards must be achieved and maintained at all stages of transporting the crude oil, manufacturing during the transport, refining and shipping any xylene.	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>The proposed project does not include transport of crude oil to or from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2

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Ch09-052	David Henry	Also workers have negligently died at this facility, how does this proposal maintain the highest safety standards and not expose workers and the communities to more cancerous substances?	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>Xylene is not classified as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene. In addition to these impacts, ethylbenzene may be carcinogenic in humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.</p> <p>An extended discussion on short- and long-term exposure to hazardous pollutants is provided in Section 3.6.2 of this Final EIS. Table 6 of this Final EIS illustrates different exposure limits based on different exposed populations (general public and workers).</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents –

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			<p>Appendix 2-A</p> <ul style="list-style-type: none"> • Controls to avoid worker exposure to toxic materials in an unplanned event – Section 9.6.2.3 and Table 9-15 • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2
Ch09-053	Will Golding	What are the environmental concerns of introducing a mixture of xylenes to activities?	<p>The potential impacts on the marine environment, wildlife, marine life, and human life resulting from the proposed project are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Designated or permitted land and shoreline use – Section 10.3.2 • Terrestrial wildlife and marine birds – Section 6.4.3 • Southern Resident killer whales and marine wildlife – Section 7.4.2 • Human life – Section 9.3.2
Ch09-054	Jennifer Bowman	<p>Xylene is extremely toxic. Inhalation of xylene or xylene vapor is the most dangerous type of exposure to this chemical. The most common side effect of inhaled xylene is depression of the central nervous system causing dizziness, headache, nausea and vomiting. Irritation of the nose and throat may also occur with low-level inhalation of xylene.</p> <p>If large amounts of xylene are inhaled, much more serious effects are likely to occur. Exposure to high concentrations of xylene can result in liver damage, kidney damage, loss of coordination, loss of consciousness, respiratory failure and even death.</p> <p>Since the EPA will no longer be able to police and regulate these types of manufacturing plants, then I sure don't want one being built near us.</p>	Thank you for your comment.
Ch09-055	Kathryn Alexandra	Xylene is known to be dangerous to the environment, wildlife and humans .	Thank you for your comment.

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Ch09-056	Ruth Holder, Phillip Holder	<p>This comment addresses Refinery Safety/Process Safety Management. The proposed project would, among other things, transport a significant amount of petrochemical feedstock into the Tesoro Refinery to be processed into 15,000 barrels a day (over 5 million barrels a year) of mixed xylenes for export. This part of the CUP would effectively transform the Tesoro's facility from a fuel refinery into a petrochemical plant. This would constitute a major change in Tesoro's business model for the facility; introduce new and expanded equipment and processes; add new and vastly expanded amounts of hazardous chemicals; and present new hazards for the workforce, surrounding communities, and the natural environment. These drastic changes demand a thorough investigation and analysis of any and all probable significant impacts. Unfortunately, the DEIS fails in this regard because it understates, and in some cases ignores, significant impacts; it also neglects to support or facilitate permit conditions or mitigation measures that would avoid or minimize the potential for adverse impacts. The Final Environmental Impact Statement (Final EIS or FEIS) must correct the many deficiencies in the DEIS and recommend permit conditions and mitigations that are critically important to ensure effective Process Safety Management programs prior to the issuance of any permit.</p>	<p>Aromatics recovery using an ARU has been identified as a refinery process for many years since these compounds provide multiple roles in fuel blend productions. The removal and export of intermediates and byproducts does not make a refinery into a petrochemical plant. The rate of xylene production at 15,000 barrels per day is small in comparison to the refinery's fuel production. In the USEPA's Profile of Petroleum Refining (1995), the products identified for this industry fall into three categories: fuels, non-fuel products, and chemical industry feedstocks. Xylene is specifically listed as a chemical industry feedstock that is produced by refineries. The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>Workplace safety requirements are managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. The refinery is required to comply with those regulations independent of the EIS or other regulatory permitting processes. Additional information regarding the agencies responsible for worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-057	Linda Dobbs	<p>I have serious concerns about the health impacts of Xylene production in our area. I urge the commissioners to conduct an in-depth review on the health and environmental impact information on this project.</p>	<p>Thank you for your comment.</p>
Ch09-058	Jean Avery	<p>Tesoro's Anacortes Refinery is not prepared to safely manufacture and export xylene, according to the DEIS.</p> <p>Therefore, this project poses threats to the beautiful San Juan Islands, the Salish Sea, surrounding communities -- and the</p>	<p>Thank you for your comment.</p>

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		climate.	
Ch09-059	Mark Meeks	The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance. .The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed. The transport of petrochemicals places risk too high to ignore, which warrant greater reservation than indicated here, with significant greater implications for the welfare of our environment and all of us together	Thank you for your comment.
Ch09-060	John A Lee	I also believe that the proposal's EIS process should emphasize review of worker and local community safety.	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or

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			<p>reformat into the marine environment – Section 13.5.7</p> <ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular training drills. Additional information regarding emergency response coordination between the refinery and the local communities is provided in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-061	John Holstein	<p>I want to comment on the Tesoro Refinery's proposed expansion project. The draft environmental impact study does not demonstrate that the Anacortes Refinery is prepared to safely manufacture and export xylene. Xylene is a highly volatile, hazardous, and noxious substance. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.</p> <p>I expect you to get back to work and do the right thing.</p> <p>Looking forward to a more careful study</p>	Thank you for your comment.
Ch09-062	Larry Weymouth	Furthermore, the DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance.	Thank you for your comment.
Ch09-063	Sarah Broderick	Xylene is a very dangerous toxin. We do not want it in our air, soil or water. We do NOT want a plant constructed that will produce such a health risk to everyone in Skagit County particularly Anacortes where I and so many others are living.	Thank you for your comment.
Ch09-064	Betsy Toll	It [Tesoro] has also not demonstrated that it can produce and transport the product safely, with regard to either its presence in	Thank you for your comment.

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		the refinery or in shipping.	
Ch09-065	Stephen D Orsini	Thank you for the opportunity to provide comment on the Tesoro Refinery's proposed expansion project. The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.	Thank you for your comment.
Ch09-066	Sara Holahan	ES7.7 Environmental Health The EIS says that within the study area "there has been significant past industrial...growth that has resulted in impacts to environmental health. The cumulative impacts from this proposal are considered to be negligible." This makes no sense. We already know the refinery has a negative impact on our health and the environment, but the recommendation is that a little bit more toxicity is okay?! The fact that we already have a compromised environment is a reason enough to disallow this proposal.	Thank you for your comment.
Ch09-067	Rebecca Durr, Greg Durr	The safety of workers in the area as well as the safety of birds, mammals, fish, and other aquatic creatures must be the first priority.	Thank you for your comment.
Ch09-068	Skagit Audubon Society, Timothy Manns	<p>10. We agree with the comment in Philip and Mary Ruth Holder's letter on the draft EIS dated May 2, 2017:</p> <p>"The receipt of new and vastly increased materials including reformat, processing using new and expanded units to produce 15,000 barrels of mixed xylenes per day, and marine loading of xylene for purposes of marketing it as a product is both qualitatively and quantitatively different from types of amounts of materials and products now present at the refinery. Xylene is not just a "3" on the National Fire Protection Association Chart, but like reformat it can accumulate static charge. Xylene can also result in distant ignition and flashback, can float on water and spread fire, can result in a fire or explosion when heated and is a</p>	<p>Xylenes and reformat are flammable and have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS). Gasoline is a category 2 flammable material under the federal OSHA regulations, while xylenes are a category 3 (slightly less flammable). Actions taken in response to a xylenes or reformat fire would be the same as responding to a gasoline fire. Issues of static charge, floating on water, confined space hazard, etc., would be a concern for gasoline or xylenes. Therefore, the refinery's existing fire prevention and response measures would be expanded to include the xylenes operation, but the proposed project does not represent a new or different set of requirements for the refinery.</p>

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		<p>confined space hazard. The planned project would transform the refinery into a petrochemical plant processing large amounts of hazardous chemicals. Yet the DEIS unacceptably treats the xylene project as if it is an inconsequential increase in business as usual.”</p> <p>The final EIS must be expanded to address how the proposed transformation of the refinery into a petrochemical plant would introduce new potential impacts to the environment from Tesoro’s facilities. We note that the City of LaConner is calling for a separate EIS for the xylene production aspect of the proposed project.</p>	<p>Aromatics recovery using an ARU has been identified as a refinery process for many years since these compounds provide multiple roles in fuel blend productions. The removal and export of intermediates and byproducts does not make a refinery into a petrochemical plant. The rate of xylene production at 15,000 barrels per day is small in comparison to the refinery’s fuel production. In the USEPA’s Profile of Petroleum Refining (1995), the products identified for this industry fall into three categories: fuels, non-fuel products, and chemical industry feedstocks. Xylene is specifically listed as a chemical industry feedstock that is produced by refineries. The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylene production and reduced sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS (WAC 197-11-440(5)(b)). Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word reasonable is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative (WAC 197-11-440(5)(b) and WAC 197-11-786).</p>
Ch09-069	Washington Physicians for Social Responsibility, Bruce Amundson, Emily Peterson, Laura Skelton	Conclusion: The draft EIS does not demonstrate that the Tesoro refinery is prepared to safely manufacture and export xylene, a toxic and highly flammable substance. We ask that you consider the above threats this project poses to public health and safety in the final EIS.	Thank you for your comment.
Ch09-070	Ruth Holder, Phillip Holder	I. Refinery Safety/Process Safety Management Our comment filed on May 2, 2017 addresses flaws in the DEIS concerning Refinery Safety/Process Safety Management that the Final Environmental Impact Statement (FEIS or Holder Supplemental Comment on	The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent

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		<p>CPUP DEIS p. 2 of 13 Final EIS) must remedy. The day after we submitted our comment on May 2, 2017, the federal Chemical Safety Board issued a third important report relevant to this permitting matter. Chemical Safety and Hazard Investigation Board. Final Investigation Report: ExxonMobil Torrance Refinery Electrostatic Precipitator Explosion Torrance, California. No. 2015-02-I-CA.</p> <p>May 3, 2017. http://www.csb.gov/exxonmobil-refinery-explosion/. Accessed May 5, 2017. See also embedded video at this website. This report concerns a February 18, 2015 explosion in the refinery’s Electrostatic Precipitator (ESP), a pollution control device in the fluid catalytic cracking (FCC) unit that removes catalyst particles using charged plates that produce sparks— potential ignition sources—during normal operation. A failure of a slide valve in the “hydrocarbon side” of the FCC unit allowed hydrocarbons to flow into the “air side” of the FCC, where they ignited in the ESP and caused an explosion. The CSB found that the avoidable explosion occurred from “weaknesses in the ExxonMobil Torrance refinery’s Process Safety Management system.”</p> <p>The incident injured four contract employees. There was a “near miss event” when explosion debris nearly hit tanks containing tens of thousands of pounds of highly toxic hydrofluoric acid that can cause injury or even death at a concentration of 30 parts per million. Debris fell on a building used by refinery operators, but luckily no one was in this building. Falling debris also caused two small fires and multiple leaks of flammable liquids. The blast caused serious property damage to the refinery and scattered catalyst dust up to a mile away from the facility into the nearby community. Following the incident, the refinery was run at limited capacity for over a year. Economic fallout included higher gas prices in California that cost drivers in that state an estimated \$2.4 billion.</p> <p>The CSB Exxon Mobile Report underscores the following issues that the FEIS must address: the pervasiveness of weak refinery Process Safety Management programs, including at Tesoro, that result in catastrophic incidents; the existential threats to refinery employees and contract employees from a weak safety program;</p>	<p>safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS. Workplace safety requirements are managed in accordance with WISHA and enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS.</p>

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		<p>and the threats that a less than robust refinery safety program impose on surrounding communities and the natural environment. This incident also illustrates another point: debilitating economic harm in the billions of dollars that can result from weak safety programs. The FEIS must also evaluate the economic impacts of unplanned incidents that result from non-mandatory and ineffective Process Safety Management programs at Tesoro. The Final EIS must correct deficiencies in the DEIS identified in our May 2, 2017 comment by fully examining the CSB's recommendations in this Report and the Report on the 2010 incident in Tesoro and ensure, point by point, that all CSB recommendations will be facilitated throughout the CPUP project. The significant adverse impacts of this project cannot be avoided in the absence of permit conditions or mitigations that require a mandatory effective Process Safety Management program for the CPUP. The FEIS must support and facilitate these conditions and mitigations.</p>	
Ch09-071	Virginia Wolff	<p>The DEIS makes clear that xylene production is an entirely new petrochemical production project involving toxic and flammable new chemicals, proposed by a refinery without experience in the endeavor, and with a history of serious safety concerns. My comments below address areas of the DEIS in which I question the determinations of insignificance, and where evaluation is insufficient or lacking.</p>	<p>Xylenes and reformate are flammable and have a similar flammability to gasoline, currently produced at the facility (see Section 9.6.1 of the Draft EIS). Gasoline is a category 2 flammable material under OSHA regulations, while xylenes are a category 3 (slightly less flammable). Actions taken in response to a xylenes or reformate fire would be the same as responding to a gasoline fire. The refinery's existing fire prevention and response measures would be expanded to include the xylenes operation, but the proposed project does not represent a new or different set of requirements for the refinery.</p>
Ch09-072	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands	<p>In summary, we are asking that the Final EIS:.. 3) worker and community safety measures be more fully addressed.</p>	<p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of the Final EIS.</p>

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	<p>Council, Climate Solutions, Puget Soundkeeper Alliance, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Community Energy Challenge, Sustainable Connections, Friends of the Columbia Gorge, United Steelworkers Local 12-591, Northwest Washington Central Labor Council, Laura Ackerman, Alyssa Barton, Stephanie Buffum, Tom Glade, Stephanie Hillman, Evergreen Islands, Michael Lang, Derek Long, Regna Merritt, Laura Ponzio, Ross Quigley, Alex Ramel, Joelle Robinson, Laura Skelton, Michele Stelovich, Eddy Ury, George Welch, Virginia Wolff, Gordon Zurn</p>		
Ch09-073	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable</p>	<p>Workplace Safety</p> <p>Tesoro’s management of the safety risks of every process and every unit for this project should be a key part of the EIS. This is only underscored by the fact that in 2010 there was a workplace accident that killed 7 workers at the Tesoro refinery. Yet, the DEIS</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and</p>

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	<p>Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Community Energy Challenge, Sustainable Connections, Friends of the Columbia Gorge, United Steelworkers Local 12-591, Northwest Washington Central Labor Council, Laura Ackerman, Alyssa Barton, Stephanie Buffum, Tom Glade, Stephanie Hillman, Evergreen Islands, Michael Lang, Derek Long, Regna Merritt, Laura Ponzio, Ross Quigley, Alex Ramel, Joelle Robinson, Laura Skelton, Michele Stelovich, Eddy Ury, George Welch, Virginia Wolff, Gordon Zurn</p>	<p>unacceptably shuts refinery workers and contractors out of the health impacts analysis. It underplays the Chemical Safety Board’s report that followed the 2010 incident. Additionally, the DEIS fails to connect the dots between workplace safety and community safety. The DEIS finds “less than significant” impacts which forecloses the possibility of meaningful conditions or mitigations to improve worker and community safety.</p> <p>Following the disaster in 2010, the U.S. Chemical Safety and Hazard Investigation Board (CSB) made findings and recommendations concerning process safety management at Tesoro (Report 2010-08-I-WA. May 2014. Investigation Report Catastrophic Rupture of Heat Exchanger (Seven Fatalities)). The CSB’s report and findings must be included in the documents reviewed by Skagit PDS prior to issuing any permit to Tesoro for the proposed xylene project and the Department ought to consult with CSB investigators as required by SEPA. WAC 197-11-335 (3) and SEPA Handbook §2.5.2.</p> <p>The time to ensure worker, community, and environmental safety at this refinery is now. Decision makers must require a strong, mandatory Process Safety Management program that expressly applies to the entire proposed project. Tesoro’s current PSM program, though improved after the tragic accident in April 2010, is not mandatory, and improvements may or may not be applied throughout the project or over the life of this project. The FEIS should be amended to ensure that these improvements become enforceable standards rather than voluntary efforts that could be withdrawn by a simple change in refinery management policy.</p> <p>We ask that the Final EIS dive deep into the Chemical Safety Board findings and recommendations, and fully support conditions and mitigations that require full implementation of those recommendations on a point-by-point basis. The FEIS should include a detailed description of the process safety culture continuous improvement program and the outcome of all process safety culture surveys, including the participation of United Steelworkers Local 12- 591 and Washington State Department of Labor and Industries in the process safety culture survey(s), per the recommendations of the U.S. Chemical Safety and Hazard</p>	<p>recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Workplace safety requirements are managed in accordance with WISHA and enforced by the Washington State Department of Labor and Industries, DOSH. The refinery is required to comply with those regulations independent of the EIS or other regulatory permitting processes. Additional information regarding the agencies responsible for worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of the Final EIS.</p>

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		Investigation Board.	
Ch09-074	Tesoro Anacortes Refinery, Rebecca Spurling	<p>H. The FEIS Should Utilize Standards Designed to Measure Public Health Impacts of an Unplanned Event</p> <p>The impacts on public health from a WCD are described as "potentially significant" because the DE IS concludes that acceptable source impact levels (ASiIs) could potentially be exceeded for up to 24 hours in the event of a WCD at the wharf or in the shipping channel.⁶⁶ We believe that ASiIs are an inappropriate standard by which to analyze public health impacts from a WCD, because ASiIs are intended to evaluate impacts from new and modified stationary sources.⁶⁷ This view is confirmed by other agencies, including Washington Department of Ecology, which use the following industrial hygiene standards, not ASiIs, when examining this impact.</p> <ul style="list-style-type: none"> • For worker safety during a response or uncontrolled spill, the OSHA PELs are the legally enforceable limit. These values are based upon continuous exposure over an eight hour shift/40 hour work week over a working lifetime that is believed to be without risk of adverse health effects for a health worker. The PEL for mixed xylenes is 100 ppm. • The EPA has also established acute exposure guideline levels (AEGIs) for airborne chemicals, which are used to describe the human health effects from a once-in-a-lifetime, or rare, exposure to airborne chemicals. AEGIs are designed to protect the elderly and children, and other individuals who may be susceptible to a particular chemical of interest and are frequently used when making decisions regarding whether a nearby community should be evacuated or placed under a "shelter in place" or other advisory. The AEGI-1 values may be used in the initial phase of a response to assess risks to the community and whether immediate action is needed. The AEGI-1 for mixed xylenes is 130 ppm. • The Agency for Toxic Substances and Disease Registry (ATSDR), in conjunction with the EPA, has derived minimal risk levels (MRIs) for a variety of chemicals. The ATSDR MRIs are derived for acute (1 to 14 days), intermediate (>14 to 364 days), and chronic (365 days 	<p>An extended discussion on short- and long-term exposure to hazardous pollutants is provided in Section 3.6.2 of this Final EIS. Table 6 in this Final EIS illustrates different exposure limits including ASiIs, USEPA AEGI-1, and WISHA PELs in the event of a spill.</p>

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		<p>and longer) exposure scenarios. The ATSDR uses the no observed adverse effect level/uncertainty factor (NOAEL/UF) approach to derive MRLS, meaning that they are set below levels that, based on current information, may cause adverse health effects in the people most sensitive to such substance CO₂induced effects. The ATSDR Acute MRI for mixed xylenes is 2 ppm.</p> <p>We suggest that the County use these standards in the FE IS to assess the impact of human health in the event of a WCD because they are designed for this assessment and the ASil standard is not.</p>	
Ch09-075	Anonymous	<p>[2015 TRI Factsheet: ZIP Code - 98221</p> <p>Data Source: 2015 National Analysis dataset (released October 2016) (updated November 29, 2016)]</p> <p>Tesoro is self-reporting on this. Scary.</p>	<p>The monitoring program is required to comply with applicable regulations, and self-monitoring and reporting is standard practice for permit compliance.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. Additional information regarding agencies responsible for emissions at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-076	Anonymous	<p>Neurotoxicology. 1986 Fall;7(3): 121-35. Irreversible effects of xylene on the brain after long term exposure:</p> <p>a quantitative study of DNA and the glial cell marker proteins S-100 and GFA. Rosengren LE, J5jellstrand P, Aurell A, Haglid KG. [commenter highlighted "These results indicate that xylene is a neurotoxin.]</p>	<p>Human and animal exposure to xylenes or reformat can result in toxic effects if concentrations are sufficiently high, as described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 <p>Additional information on the toxicity of xylenes to animals is provided in Section 3.5.2 of this Final EIS.</p>
Ch09-077	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand,	<p>Impacts to Workplace and Process Safety</p> <p>The DEIS failed to include a full analysis of probable significant adverse impacts to refinery workers and contractors from unplanned events including explosions, fires, spills, leaks, upsets, and releases of combustion products and toxic air contaminants into the air. On April 2, 2010, such an incident resulted in an</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements and the status of</p>

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	<p>Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>explosion and fire that killed 7 refinery workers. Ignoring the findings and recommendations in a Chemical Safety Board (CSB) Report that followed this incident, the DEIS accepts information about nonmandatory and unenforceable “safety programs” to reach a dubious finding of “less than significant” impacts on “public health” from “fire” during construction or operation of the proposed project. This failure deprives decision makers of the opportunity to improve workplace safety and add a layer of environmental protection against unplanned incidents. The Final EIS must remedy these defects and fully support implementation of an effective Process Safety Management program for the CPUP applicable over the life of the project.</p> <p>Although Chapter 9 of the DEIS briefly discussed the horrific 2010 incident at Tesoro and referenced the CSB Report, the DEIS did not discuss the findings and recommendations of this Report. The CSB Report found that this incident could have been prevented, identified significant problems with Tesoro’s ineffective Process Safety Management program, and made specific recommendations for critically important safety improvements. Among other things, the CSB found that Tesoro Refinery management “normalized” a hazardous condition for a process unit: the heat exchangers for the naphtha hydrotreater (this unit would be expanded for the CPUP project and used in the production of mixed xylenes). The CSB found overall that Tesoro’s process safety management program, based on practices that controlled risks rather than practices that would substantially reduce risks or prevent them from arising in the first place, was inadequate to prevent such catastrophes. The DEIS treats the 2010 fatal incident and the CSB recommendations superficially. The DEIS also ignored the pending enforcement case against Tesoro following the 2010 incident brought by the Washington Department of Labor and Industries for 44 alleged violations (39 of which were classified as “willful,” 5 as “serious”) and seeking a proposed a fine of just under \$2.4 million. The FEIS must not ignore this major safety incident and the subsequent Report and legal case but must ensure that its analysis supports and facilitates permit conditions and mitigations to ensure safe practices.</p>	<p>Tesoro’s implementation of the CSB report on the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Explosions are discussed in Chapter 9 of the Draft EIS. Air emissions, including emissions from spills, are assessed in Chapter 4 of the Draft EIS.</p> <p>The safety of refinery workers in the event of a spill, fire, or an explosion was discussed in the unplanned events discussions in Section 9.6 of the Draft EIS.</p> <p>The Draft EIS’s use of “immediately address” refers to the response to a fire. The time to contain and extinguish a fire would depend on the fire. In the case of the 2010 explosion, extinguishment took 3 hours as the Draft EIS notes.</p> <p>The “no significant change in the presence of flammable materials” discussion in Section 9.6.1 of the Draft EIS only analyzes flammability of materials specific to the proposed project. The measures that the proposed project would use to manage other types of health and safety risks are discussed throughout the Draft EIS, notably in the following sections:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Tesoro is responsible for complying with applicable regulations and WISHA is responsible for ensuring Tesoro’s workers are not exposed to air contaminants at</p>

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		<p>The conclusion in Section 9.6.1 of the DEIS, Potential Impacts on Health from Fires at the Refinery During Operations and Maintenance, “[c]onsidering the controls that are now in place and the lack of a significant change in the presence of flammable materials at the refinery, impacts on public health as a result of a fire during construction or operation of the proposed project would be less than significant,” is deficient for the following reasons:</p> <ul style="list-style-type: none"> • The DEIS fails to expressly include refinery workers and contractors in the discussion of adverse impacts on “public health;” • The DEIS’s conclusion only addresses “fire” in contravention of WAC 19711444(2)(ii) that specifically requires “risks of explosions” to be addressed in an EIS and despite the fact that the 2010 incident involved an explosion and fire; and -The DEIS fails to analyze the risks and consequences of all types of incidents including explosions, fires, spills, leaks, upsets, and releases of combustion products and toxic air contaminants into the air that would result in probable significant adverse impacts to refinery employees and contractors. <p>The statement that Tesoro’s ”own trained 24hour fire response brigade ... would immediately address any fires at the facility” is questionable in light of the fact that the fire following the 2010 explosion burned for three hours unless “address” means the brigade would respond to a fire immediately. The FEIS must clarify whether “address” means “respond to” or “contain and extinguish” a fire.</p> <p>Reliance on “no significant change in the presence of flammable materials at the refinery” (emphasis added) ignores the significance of the mixed xylenes production part of the project. Presence is different from the amount and nature of the materials and the new process units needed to produce the mixed xylenes. The DEIS states that the proposed project requires the operation of new, expanded, and existing process and storage units at the refinery as well as the use of new and additional amount of materials, including highly hazardous materials. DEIS §2.8 says “[o]peration would increase the use of materials handled at the</p>	<p>DOSH is responsible for ensuring Tesoro workers are not exposed to air contaminants at concentrations greater than worker PELs for both acute and chronic exposures and that Tesoro takes all required steps to inform workers of the potential hazards of chemical exposure and provides appropriate training and personal protective equipment to prevent exposures. Air emissions must also meet air concentration limits protective of chronic exposures to the general public (the ASILs), which are regulated by Ecology (see Table 2 of this Final EIS). Air emissions are discussed in both Chapter 9 and Chapter 4 of the Draft EIS. Section 3.6 of this Final EIS provides an expanded discussion on acute and chronic exposure limits for both workers and the general public.</p> <p>Cumulative impacts from regular operations of surrounding industry (such as the Shell Anacortes refinery) were considered in the Draft EIS analyses (e.g., see cumulative air and water quality impacts in Sections 4.7, 4.8, and 5.6 of the Draft EIS). However, the potential for incidents at other locations unrelated to the proposed project are not within the scope of the analysis as the assumptions required to perform such an analysis would be speculative.</p> <p>The safety of spill response workers is discussed in Section 9.6.2.5 of the Draft EIS.</p>

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		<p>refinery, and would introduce new materials to be used in the ARU and boiler.” New materials that would be used for the project are sulfolene and aqueous ammonia. The project would significantly increase the amount of natural gas, reformate and perchloroethylene. The receipt of new and vastly increased materials including reformate, processing using new and expanded units to produce 15,000 barrels of mixed xylenes per day, and marine loading of xylene for purposes of marketing it as a product is both qualitatively and quantitatively different from types of amounts of materials and products now present at the refinery. The FEIS must take these into account when determining health impacts rather than just base a finding on the “presence” of flammable materials.</p> <p>The DEIS inadequately addressed direct, indirect and cumulative health impacts to refinery workers from exposure to increased amounts of reformate (containing toluene, benzene, trimethylbenzene, ethylbenzene, isopropylbenzene and xylene isomers), xylene, ethylbenzenes, and perchloroethylene and new process chemicals aqueous ammonia and sulfolene that would be used for the production of mixed xylenes. The FEIS must address direct, indirect and cumulative impacts to refinery workers from both chronic and acute exposure to each of these chemicals.</p> <p>The DEIS acknowledges that “exposure to hazardous chemicals can result in both acute and chronic health impacts, depending on the substance type, exposure dose, duration, and frequency.” The only worker health impact discussed is exposure during a spill event (DEIS inappropriately contains no analysis for leaks or upsets) in which inhalation occurs. §9.6.2.3. WAC 19711444(2)(iii) requires the analysis of “releases or potential releases to the environment affecting public health, such as toxic or hazardous materials” not just analysis of “spills.” For conclusions about the unlikelihood of chronic health impacts from spills, the DEIS considers only spills “lasting for a short duration” and without further explanation, concludes that “prolonged human exposure is not expected.” The discussion about impacts from exposure to these chemicals is not comprehensive enough to support any reasonable conclusion about worker health impacts from chronic, acute, and/or</p>	

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		<p>cumulative exposure to these materials. The FEIS must address direct, indirect and cumulative impacts to refinery workers and contractors from both chronic and acute exposure from all types of routine operations and unplanned incidents including: explosions, fires, spills, leaks, upsets, and other releases of combustion products and toxic air pollutants into the air.</p> <p>The DEIS overlooks the direct link between an ineffective Process Safety Management program and the probable adverse impacts on the health of surrounding communities and the natural environment. The findings, recommendations and administrative actions in two matters must be analyzed in the FEIS: the CSB Report on a Chevron refinery incident in Richmond California in August 2012 (CSB. Final Investigation Report Chevron Richmond Refinery Pipe Rupture and Fire. Report No. 201203ICA. January 2015.</p> <p>http://www.csb.gov/assets/1/16/Chevron_Final_Investigation_Report_20150128.pdf. Accessed April, 2017.) and the February 2015 incident in Skagit County (Preston, S. Northwest Clean Air Agency. Shell's Puget Sound Refinery Penalized for Chemical Release. Nov. 16, 2016. http://nwcleanairwa.gov/newsrelease/shellpugetsoundrefinerypenalizedforchemicalrelease/ Accessed April 2017.).</p> <p>Like with the Tesoro incident, the CSB found that Richmond California incident was avoidable and the refinery had an ineffective Process Safety Management program. In Richmond, a vapor cloud enveloped 19 refinery workers who narrowly escaped injury or death. The cloud ignited and burned hydrocarbon process fluid creating a large plume of vapor, particulates and black smoke that traveled across the surrounding area. Some 15,000 people from the surrounding communities sought medical treatment for breathing problems, chest pain, shortness of breath, sore throat, and headaches. Twenty were hospitalized. In the case of Tesoro, not only would employees, contractors and the public in nearby communities be threatened by such an incident, but it is Padilla Bay and the natural resources dependent upon it would be in the path of a vapor cloud.</p>	

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		<p>Another very recently released CSB report that the FEIS must take into account also illustrates the threats that weak refinery safety programs impose on surrounding communities. Chemical Safety and Hazard Investigation Board. Final Investigation Report: ExxonMobil Torrance Refinery Electrostatic Precipitator Explosion Torrance, California. No. 201502ICA. May 3, 2017. http://www.csb.gov/exxonmobilrefineryexplosion/ Accessed May 5, 2017. Among other things this incident, that occurred in a community near Los Angeles, injured four contract employees. The blast also scattered catalyst dust up to a mile away from the facility into the nearby community.</p> <p>At the Shell Puget Sound Refinery in Anacortes a flare line released uncombusted hydrogen sulfide, dimethyl sulfide, mercaptans, and benzene into the atmosphere and south from the refinery through the Swinomish Reservation and the town of La Conner. As a result of the release of these materials, hundreds of people reported symptoms that included irritation of the eyes, throat and lungs, headaches, nausea, fatigue and loss of appetite. Twelve people from the Swinomish Tribe sought medical treatment and five went to emergency rooms or area hospitals.</p> <p>These incidents clearly demonstrate that safety breaches, harm to community health, and environmental degradation are related. The FEIS must evaluate the effectiveness of Tesoro's Process Safety Management program in light of its connection to impacts on the health of surrounding communities and the health of the natural environment. This analysis must account for disproportionate impacts and risks born by the Swinomish and Samish Tribes and justify findings as to whether these impacts have significant environmental justice, social or cultural ramifications.</p> <p>The CSB Report discusses several modifications made to Tesoro's Process Safety Management (PSM) program following the incident (these are outlined in the DEIS). While we applaud Tesoro's commitment to take some steps in the right direction, their description in the DEIS raises several important concerns and questions. The modifications cited:</p>	

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		<p>Have apparently not been completed to the satisfaction of the CSB;</p> <p>Represent only a subset of the CSB's recommendations to achieve an effective PSM program; they do not demonstrate implementation of a comprehensive effective program;</p> <p>Are neither mandatory nor enforceable (the CSB has no regulatory or enforcement authority; the changes are not required by existing state regulations);</p> <p>Could be eliminated by changes in management, refinery ownership, or policy;</p> <p>May or may not be applied to each, every and all processes and equipment (new, expanded and existing) that would be used for the mixed xylenes project; ? Do not demonstrably ensure an environment at Tesoro in which all employees and contract workers are empowered to take meaningful action to reduce or prevent incipient safety hazards; and ? May or may not apply over the life of the project.</p> <p>The DEIS assumed that modifications to Tesoro's safety program are in place without confirmation. The DEIS apparently failed to examine the CSB's Investigation Status Report regarding the new measures the DEIS relies upon to reach its conclusions about the revised PSM elements. The FEIS must not overlook the information in this Report. (CSB. Tesoro Refinery Fatal Explosion and Fire, Investigation Status, Recommendations, various Recommendation Status Change Summaries. http://www.csb.gov/tesororefineryfatalexplosionandfire/ . Accessed April 2017.). The Report demonstrates that all of the modifications relied upon by the DEIS remain unresolved. The FEIS must not perpetuate this error.</p> <p>In a number of sections, the DEIS is uncomfortably silent on the safety of spill response workers and first responders:</p> <p>The DEIS addresses Geographic Response Plans, but not the safety of first responders deploying the GRPs in section 13.5.7. Spill Response;</p> <p>The DEIS addresses worker safety, but not first responders in</p>	

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		<p>Appendix 13-A, Section 7.2 Human Health, page 53;</p> <p>Respiratory protection and protective clothing should be as in addressed in the 2016 Emergency Response Guidebook (from the US Department of Transportation, Pipeline and Hazardous Materials Safety Administration see https://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Hazmat/ERG2016.pdf): “Wear positive pressure selfcontained breathing apparatus (SCBA). Structural firefighters' protective clothing will only provide limited protection;” Other elements of Tesoro’s PSM program listed in Appendix A2 Section 2 track existing federal and Washington State PSM regulations found by the CSB to be inadequate to reduce risks or prevent them from arising in the first place. Among other things, many of the provisions in these regulations are advisory including the rules that rely on various best practices documents. The CSB further found that the Washington Department of Labor and Industries lacked sufficient budget and expertise to conduct robust inspections and effectively enforce even the less than effective rules. The CSB’s Investigation Status Report demonstrates that there has been no resolution of the recommendations for stronger state regulations or budget for a wellfunded, well staffed regulator. Refinery safety thus remains subject to the federal and state rules and their enforcement that the CSB found ineffective to prevent deadly catastrophes like the 2010 Anacortes explosion and fire. The FEIS cannot reasonably rely on these rules to conclude that sufficient safety controls are in place to avoid significant adverse impacts.</p> <p>The CSB Report on the Tesoro 2010 incident included detailed recommendations for additions and improvements to refinery PSM programs. Broadly summarized here but discussed thoroughly in the Report these include the following elements:</p> <p>Inherently safer design practices to the greatest extent feasible to reduce risks to as low as reasonably possible (ALARP); Comprehensive and thoroughly documented Process Hazard Analysis that includes using hierarchy of control analysis to reduce risks to ALARP and uses structured methods, such as layer of</p>	

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		<p>protection analysis, to ensure adequate safeguards in process hazard analyses;</p> <p>Written performance indicators (including indicators that measure safety culture) made available to employees with measurable metrics to evaluate effectiveness in performance based safety systems;</p> <p>Periodic safety culture assessments including effective participation of the workforce and their representatives in the development of safety culture surveys and the implementation of corrective actions;</p> <p>Damage mechanism hazard reviews included in the process hazard analysis cycle; - Root cause analyses after significant accidents or releases occur; and ? Written programs to account for human factors and organizational changes.</p> <p>The CSB also recognized that in order to ensure effectiveness and enforceability of these program elements, worker participation in all PSM elements must be assured, with worker representatives selected by the workforce. The process safety culture assessment element must encourage employee and contract employee reporting of process safety concerns, near misses, injuries and incidents (and procedures must fully support worker shut down authority); ensure that reward or incentive programs do not undermine reporting, ensure that production pressures do not compromise process safety and promote effective process safety leadership at all levels.</p> <p>There is no demonstration in the DEIS assuring that Tesoro’s “safety culture” meets these standards or that it would be applied throughout all processes and process units (new, existing and expanded) for the mixed xylene production project and over the life of the project. The FEIS must correct deficiencies in the DEIS, analyze the CSB’s recommendations, and ensure that its analysis supports permit conditions and mitigations including them.</p> <p>To gain a greater understanding of the CSB’s findings, recommendations, and status report and their applicability to this permit matter, the Skagit County PDS Department should consult with CSB investigators as called for by SEPA. WAC 19711335 (3) and SEPA FEIS Handbook §2.5.2. Skagit PDS should also consult</p>	

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		<p>with the Washington Department of Labor and Industries, Division of Occupational Safety and Health for information about the enforcement case as well as about the state’s existing regulation of Process Safety Management standards.</p> <p>The DEIS is inadequate because it fails to provide support for additional conditions or mitigation to ensure a robust and effective Process Safety Management program that would be applied to the mixed xylenes project. This is unacceptable in light of Tesoro’s track record on safety, the risks associated with the construction and operation of this project, and the CSB findings about the ineffectiveness of existing state and federal regulations. The Final EIS must correct this deficiency by fully examining the CSB’s recommendations and ensure, point by point, that these recommendations will be facilitated throughout the CPUP project. The significant adverse impacts of this project cannot be avoided in the absence of permit conditions or mitigations that require a mandatory effective Process Safety Management program. Decision makers must require that all of the CSB recommendations are implemented for this project and require Tesoro to actively participate in and fully support the effort to make changes to state safety regulations that would implement all of the CSB’s recommendations.</p> <p>The following information should be included in Appendix 2A of the FEIS:</p> <ol style="list-style-type: none"> 1. A detailed description of changes to operations at the Tesoro Anacortes Refinery as a result of the Clean Air Act Violation (settlement in 2016); 2. The current status of all civil and environmental legal proceedings and the results of any penalty cases and the criminal investigation of the 2010 explosion; 3. A xylene production risk analysis that includes incident and accident data from the Tesoro Anacortes Refinery. 4. A detailed description of the process safety culture continuous improvement program and the outcome of all process safety culture surveys, including the participation of United Steelworkers Local 12591 and Washington State Department of Labor and Industries in the process safety culture survey(s), per the 	

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		<p>recommendations of the U.S. Chemical Safety and Hazard Investigation Board (see CSB’s website on Tesoro’s 2010 explosion and fatalities: http://www.csb.gov/tesororefineryfatalexplosionandfire/) .</p>	
Ch09-078	Anonymous	<p>[Copy of the Wikipedia entry for Toxics Release Inventory; https://en.wikipedia.org/wiki/Toxics_Release_Inventory]</p>	Thank you for your comment.
Ch09-079	Evergreen Islands	<p>ENVIRONMENTAL HEALTH</p> <p>What are the impacts of the increased oil vessel traffic (5 vessels & barges/month) in the Salish Sea?</p> <p>Will the Naphtha Hydrotreater unit be “super safe” such that no further loss of life occurs?</p> <p>Regarding the Naphtha Hydrotreater, is Tesoro complying with the U.S. Chemical Safety and Hazard Investigation Board’s safety recommendations?</p> <p>What are the cumulative impacts associated with other crude oil and coal terminal projects, including associated rail and marine operations?</p> <p>What is the volatility of crude oil, xylene, and petroleum products and the risk of fire and/or explosion at the project site (including security/terrorism concerns)?</p> <p>What is the volatility of crude oil xylene, and petroleum products and the risk of fire and/or explosion along rail or marine transportation routes (including security/terrorism concerns)?</p> <p>What are the impacts of noise from plant operations?</p> <p>What are the impacts of noise along rail and marine transportation routes?</p> <p>Will studies 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 be conducted?</p>	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Ch09-080	Katherine Johnson	<p>I live in Anacortes within view of the Tesoro Refinery on March Point. I am deeply concerned about the health impacts of Xylene to workers, citizens, and the environment. It appears that more study needs to be done on this potentially lethal petrochemical.</p>	The toxicity of xylenes and reformate to animals and humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. A discussion of the toxicity of xylene (and reformate) to animals

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			<p>and humans is provided in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information on the toxicity of xylenes and the carcinogenic potential of xylenes is included in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker and community health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-081	AJ Kuntze	Thank you for your time and efforts to help ensure the safety and well being of our local communities as you move forward.	Thank you for your comment.
Ch09-082	Tony Idczak	The resident taxpayers of this area are already subjected to too much toxic pollution from the current operations of two of the largest emitters in the state. To suggest that they should be allowed to further imperil our safety and health , our environment and even our lives, for the sake of export profits is insulting.	Thank you for your comment.
Ch09-083	Maureen Scheetz	<p>The EIS that Tesoro performed is lacking important data related to the health and safety of the environment and communities that surround the Refinery.</p> <p>The EIS Tesoro study proves that construction, chemical spills, vessel propellers, and waste water can damage vegetation, fish habitat, wildlife, birds and marine life. Our environment can not handle more toxins. We have already crossed the line of what the Pacific Northwest waters, air and wildlife can manage successfully.</p>	Skagit County, as the lead agency, is overseeing the preparation of this EIS and is ensuring that applicable regulations and requirements under SEPA are followed.
Ch09-084	Bay Renaud	Please do not allow Tesoro's clean product upgrade and please make sure you require the highest safety standards during all	Thank you for your comment.

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		phases of production and transportation if you allow it.	
Ch09-085	Patricia Young	Please protect the safety of the inhabitants along the rail lines and on this island. Please ensure the legacy of this pristine area, the Salish sea and the eco/environment that depend on it. Please enforce the highest standard of protection and put lives ahead of corporate profits.	<p>The proposed project does not include transport of crude oil by rail to or from the Tesoro Refinery. See Chapter 2 for the project description. Potential environmental impacts associated with transport of crude oil by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating health and safety as well as the environment is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-086	Ben Bama	Tesoro's safety and pollution records while manufacturing xylene need to be taken into account.	The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A

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			<p>of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>All xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS).</p> <p>Additional information regarding agencies responsible for regulating worker health and safety and the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-087	Steve Garey	<p>THE SIGNIFICANT LEVEL OF NEW CAPITAL INVESTMENT THAT IS PROPOSED ALSO HAS THE POTENTIAL TO MAKE THE REFINERY SAFER, MORE EFFICIENT, AND EASIER TO MONITOR AND CONTROL. ANOTHER IMPORTANT BENEFIT FOR WORKERS, OUR COMMUNITY, AND THE ENVIRONMENT. IN ORDER TO REALIZE THESE BENEFITS, THE FINAL EIS SHOULD REQUIRE THAT MODERN PROCESS SAFETY MANAGEMENT CONCEPTS SUCH AS “ INHERENTLY SAFER DESIGN” AND “HIERARCHY OF CONTROLS ANALYSIS” IS APPLIED TO THE DESIGN AND CONSTRUCTION OF THE NEW UNITS, SO AS TO REDUCE RISK FROM OPERATION TO AS LOW AS REASONABLY POSSIBLE.</p>	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS).</p> <p>Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the</p>

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			<p>Draft EIS:</p> <p>Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5</p> <p>Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A</p> <p>Vessel safety and waterway management – Section 13.4.1.2</p> <p>Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7</p> <p>Coordination and training between Tesoro and local emergency service providers – Section 11.4</p>
Ch09-088	Ed Gastellum	<p>I do not trust Tesoro Management's judgement as it is obvious by the draft Environmental Impact Statement, that they take too casually the recommendations of the Investigative Report of 2010 refinery explosion and fire that killed 7 people. This is reflected in the minimal emphasis in the long-term significant effects analysis of all phases of the xylene proposal.</p> <p>Whereas the draft EIS acknowledges the 2010 explosion and fire, it shamefully omits employees and contractors from the significant health impacts analysis. The Chemical Safety Board Report made some significant recommendations after the investigation and to this day those recommendations have not been completed or addressed after 7 years.</p> <p>We, as a close residents of the Tesoro Refinery, feel that Tesoro Management has failed to address workplace safety, community safety, and environmental safety by not addressing the worst case scenarios.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p>
Ch09-089	Joline Betterndorf	<p>2. Tesoro assures careful management of regulations will virtually limit accidents from the transportation to and from the refinery of reformates and manufacture of xylene. They rely on "embedded controls," regulations which they will monitor and be responsible for. These assurances are highly suspect. There is no agency with the means to inspect and control this industry's self-regulating. They rely on agencies to correct damage once it has occurred. Even with the best intentions, accidents happen. People make</p>	<p>Thank you for your comment.</p>

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		mistakes or get careless. The industry's safety record and testimony from Tesoro employees, does not inspire confidence in selfregulation.	
Ch09-090	Delia Surprenant	<p>I spent 30 years working in the Costume Crafts field; working for companies like Seattle Opera, Long Wharf Theatre, Disney, Theatre by the Sea, and Vee Corp (a division of Jim Henson's Muppets). I am intimately familiar with xylene and it's effects on human health as I maintained the MSDS and MDS files in many of the theatres that I worked. I was required to take safety training in-services by OSHA, and xylene was always a chemical that was on the most dangerous lists; requiring respirator, barrier glove, and protective clothing use. The theatre industry actively seeks products that have been reformulated- to remove this and other dangerous chemicals from the products that are used by thousands of Professional Crafts Artisans daily. The thought of this chemical being produced in the PNW in a facility right on our precious Puget Sound and being transported on the Salish Sea outrages me. This is a chemical that endangers human life daily, and needs to be phased out of use.</p>	<p>Human and animal exposure to xylenes or reformat can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The toxicity of xylenes and reformat to animals and humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the following sections of the Draft EIS:</p> <p>Terrestrial wildlife, including marine birds – Section 6.4.3.3 Marine species – Section 7.4.3.2 Human health (air emissions and spills) – Sections 9.3 and 9.6.2 Spills and information on toxicity – Section 13.5</p> <p>The refinery has systems in place designed to properly handle the chemicals on site (including xylenes), prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for</p>

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			regulating human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1.
Ch09-091	Tyler Wagner	As a young person who loved growing up in the Pacific Northwest and want to live here for the rest of my life and raise a family here, I want to protect the health and nature of our beautiful region. Please consider these above requests to help ensure that future for myself and many other people here in Cascadia.	Thank you for your comment.
Ch09-092	Tom Schwegler	Thank you for considering this critical environmental and human health issue.	Thank you for your comment.
Ch09-093	Aaron Rust	We do not need any more enviromental hazards, explosions, or threat to human life!!	Thank you for your comment.
Ch09-094	Charles Rapport	I believe the DEIS does not demonstrate that Tesoro’s Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous and noxious substance.	Thank you for your comment.
Ch09-095	Claudia Ross-Kuhn	The DEIS does not demonstrate that Tesoro’s Anacortes Refinery is prepared to safely manufacture and export xylene. It is a highly volatile, hazardous and noxious substance.	Thank you for your comment.
Ch09-096	Mark Lundholm	As an environmental scientist with OSHA 40 Hour Hazmat certificate I find it hard to understand how this chemical is allowed to be manufactured or handled in any way shape of form. As one of the BTEX chemicals to avoid, whose properties are well known to be carcinogenic this proposal by Tesoro should be firmly and finally cancelled!	Xylene is not regulated as a carcinogen by the U.S. Environmental Protection Agency (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene. In addition to these impacts, ethylbenzene may be carcinogenic to humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding the potential for xylenes to cause cancer in humans is provided in Section 3.6.1 of this Final EIS.
Ch09-097	Ellen Johnson	As a former resident of Washington, I am horrified by the potential damage that could be done to such a pristine environment by this project (not to mention the health consequences!).	Thank you for your comment.

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Ch09-098	Keith Hitchcock	I'm writing to express my concerns for my family, the state of Washington, and the earth.	Thank you for your comment.
Ch09-099	Trace Farrell	1) it is unclear to me that Tesoro's Anacortes Refinery can safely manufacture and export a hazardous and volatile substance like xylene.	<p>The refinery has systems in place designed to properly handle xylenes on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding the agencies responsible for regulating the health and safety of workers and the community is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-100	Anna Fahey	Let's put people and safety before the profit interests of the oil refiners. Anacortes has suffered enough pollution and toxic messes to take a stand now against more recklessness. It's the responsible thing to do. We need leaders who will take the long view, not pander to industry, but protect the place and the people in this area.	Thank you for your comment.
Ch09-101	Kathryn Trueblood	The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, or for that	Thank you for your comment.

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		matter that anyone is. More highly toxic petrochemicals is not the way to go in an area prized for its natural beauty.	
Ch09-102	Carolee Colter	I'm very concerned about the safety problems with producing and shipping xylene. It is a hazardous substance.	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the regulatory authorities responsible for safety at the refinery and for safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-103	Joyce Weir	<p>Each project that exposes our life on earth to these toxic chemicals threatens the continuation of life on this planet.</p> <p>Do you want to be responsible for causing this result ?</p> <p>The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.</p>	Thank you for your comment.

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Ch09-104	Rene Vance	<p>I believe the DEIS adequately addressed the concerns of exposure and marine traffic. I have been hearing a lot of concerns over xylene. Yes, it's a scary-sounding word that starts with "x"; however, it's already in our gasoline and in the refineries. The CPUP project will merely concentrate it into near-pure form. Yes, a Safety Data Sheet (SDS) for xylene gives warnings of its flammability and inhalation hazards. That is true of gasoline too, yet we pump it into our cars ourselves, while xylene will not be handled directly by the public. Refineries are equipped to handle such substances. The refineries conduct extensive safety and environmental training, and routine marine spill drills.</p>	<p>Thank you for your comment.</p>
Ch09-105	Randall Collins	<p>My primary concern is safety</p>	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for safety at the refinery and for safety in marine waters is provided</p>

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			in Table 2 in Section 3.1 of this Final EIS.
Ch09-106	Marian Wineman	As a toxicologist who worked on human health and ecological risk assessments for my entire career, I find that the DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance.	Thank you for your comment.
Ch09-107	Howard Cherrington	The risks of exposure for any spills or mishandling of xylene would be cause for potentially serious health impacts.	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high. The toxicity of xylenes to animals and humans from exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. The toxicity of xylene (and reformate) to animals and humans is discussed in the following sections of the Draft EIS:</p> <p>Terrestrial wildlife, including marine birds – Section 6.4.3.3 Marine species – Section 7.4.3.2 Human health (air emissions and spills) – Sections 9.3 and 9.6.2 Spills and information on toxicity – Section 13.5</p> <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is included in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety

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			<p>management, preventive measures and inspections, and oil spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular training drills. Additional information regarding emergency response coordination between the refinery and the local communities is provided in Section 3.7.1 of this Final EIS. Additional information regarding agencies responsible for protecting human and worker health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-108	Charis Weathers	Xylene, which is a highly volatile, hazardous, and noxious substance, has not been supported by the DEIS to demonstrate that it can be safely manufactured or exported by the Tesoro refinery in Anacortes. This leads me and an enormous amount of other people, to conclude that this project should not be permitted as proposed.	Thank you for your comment.
Ch09-109	Glen Anderson	The DESIS on the Tesoro Refinery's proposed expansion project FAILS to demonstrate that Tesoro's Anacortes Refinery can SAFELY manufacture and export xylene.	Thank you for your comment.
Ch09-110	Glen Anderson	<p>Xylene is a HIGHLY VOLATILE -- AND HAZARDOUS -- AND NOXIOUS substance.</p> <p>It THREATENS OUR LOCAL ENVIRONMENT, PUBLIC HEALTH, OUR SALT WATER ECOSYSTEMS, OUR AIR, AND THE EARTH'S CLIMATE.</p>	Thank you for your comment.
Ch09-111	Amy Morrison	I am highly concerned that the DEIS does not demonstrate that there is adequate safety measures for this highly toxic substance.	Thank you for your comment.

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Ch09-112	Mikyn Sygitowicz	Thank you for taking comments from our community. I write as a third-generation resident of Bellingham and Whatcom County, based on my apprehensiveness about the proposed Tesoro Anacortes CPU Project, and that it poses a hazard to our environment, our public health, and the sensitive Salish Sea ecosystem.	Thank you for your comment.
Ch09-113	Kate Lunceford	I am deeply concerned that planning for a xylene plant in Anacortes will put human and sea life at risk and further damage the environment.	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. Additional information regarding these regulations is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular training drills. Additional information regarding emergency response coordination between the refinery and the local communities is provided in Section 3.7.1 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Controls to avoid worker exposure to toxic materials in an unplanned event – Section 9.6.2.3 and Table 9-15 • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2

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Ch09-114	Kenneth Crawbuck	Why do I object to this intensification? Have you driven by this refinery as I do twice a week - especially when the wind is blowing over the road and towards the indian reservation who rightfully owns that land? Has anybody done an honest job of detailing the health impacts to the people of that area, and the environment in that area?	<p>In general, the proposed project is designed to control xylene emissions. Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The health and environmental impacts associated with a xylene spill and subsequent evaporation to air are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality – Section 4.4.4.2 • Terrestrial wildlife and marine birds – Section 6.4.3.3 • Human health – Section 9.6.2 • Xylene spills in the marine environment – Section 13.5
Ch09-115	Jess Wallach	...I am a Washington State resident. I am extremely concerned about this proposed expansion project for a number of reasons, most significantly the health and safety risks that it poses to our region.	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. Additional information regarding these regulations and operations plans is provided in Table 2 in Section 3.1 of this Final EIS. Regulatory details are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular training drills. Additional information regarding emergency response coordination between the refinery and the local communities is provided in Section 3.7.1 of this Final EIS.</p>
Ch09-116	Caroline Armon	Xylene is a highly volatile, hazardous and toxic petrochemical which has never before been manufactured in our region and	Thank you for your comment.

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		transported through our waters.	
Ch09-117	Dena Jensen	<p>And while I, as a resident living by a refinery, can arguably move, workers who are the life of the refinery, cannot leave, nor do any of the creatures or fixed lands, waters, and air have any warning or ability to escape when negative impacts present themselves. This is why I feel very strongly that your draft EIS must scrupulously examine and address every potential impact from the project at Tesoro. It is not fair that citizens and the surrounding land, air, water, and life forms are left vulnerable to negative and potentially lethal impacts when it is possible to prevent these.</p>	<p>The refinery's employee training along with a description of their process safety management program is discussed in Appendix 2-A of the Draft EIS. A description of the regulatory authorities for worker health and safety and for vessel traffic management and spill response is included in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health, as provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-118	Aaron Adams	<p>In a day and age where it seems parties and corporations have more power than the people you govern, it is important that the health and safety of the citizens and residents are put first, over all other concerns.</p> <p>Take this version of the classic trolley problem: There is a freight train barreling down the tracks, out of control, because the locomotive broke free. Coming up is a fork in the track. On one, there are many people trapped on the rails, tied down by some criminals. On the other, the train will be shunted on to an empty track, that will result in the train being dumped in to a bottomless pit, never to be seen again. Which do you choose, the one that kills the people or the one that destroys the goods? That train is the Tesoro refinery, and the several people represent the 7.5 billion people that will have to deal with the long term consequences of your generation's poor decisions.</p> <p>Anyway, that's my take, so with that in mind, feel free to read the stock comment that provides evidence and detail.</p>	Thank you for your comment.
Ch09-119	L Ship	Xylene is highly noxious and dangerous to living creatures and the environment.	Thank you for your comment.

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Ch09-120	Pam Borso	It is vitally important that at this time we attend to the safety of the refinery and it's total impact on the environment.	Thank you for your comment.
Ch09-121	Patricia Rathmann	There is no way to guarantee the safety of this project.	Thank you for your comment.
Ch09-122	Robertta Clarke	People's health and safety are more important than higher profits for an oil company. It's time to stop putting corporations ahead of people.	Thank you for your comment.
Ch09-123	Joyce Harrington	<p>As a biologist who did work in a histology lab that used xylene and had several safety measures to avoid mishaps, I know that xylene is a highly volatile, hazardous and noxious substance. Its manufacturing and exporting should have very very safe procedures.</p> <p>That is why I feel that the threats that this project poses to our climate, the Salish Sea, as well as the surrounding community, make it clear that this project should not be permitted as proposed.</p>	Thank you for your comment.
Ch09-124	Corinne Salcedo	I'm concerned that the manufacture and export of xylene, a neurotoxin, might not be safe.	<p>The refinery has systems in place designed to properly handle the chemicals on site (including xylenes), prevent releases, control worker exposures, and respond to spills and unplanned events. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4
Ch09-125	Tyler Wagner	As a young person, I am very concerned what these extra trips will	The Draft EIS discusses the increase in vessels as a result of the

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		do to the health of our community and environment in the present and in my future.	<p>proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>The potential impacts to human health and the environment resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality – Sections 4.4.3 and 4.4.4 • Marine birds – Section 6.4.2 and 6.4.3 • Special status terrestrial species – Section 6.5 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Human health – Sections 9.3.2, 9.5.2, and 9.6.2 • Vessel traffic , vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Controls to avoid worker exposure to toxic materials in an unplanned event – Section 9.6.2.3 and Table 9-15 • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding agencies responsible for regulating marine vessels, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS. Additional information regarding toxicity of xylenes to</p>

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			marine birds and aquatic life is provided in Section 3.5.2 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch09-126	Glen Anderson	<p>Xylene is EXTREMELY DANGEROUS. It is highly volatile, hazardous, and noxious.</p> <p>This project ENDANGERS the upper Puget Sound area and related waters, public health and earth's climate.</p>	Thank you for your comment.
Ch09-127	Dennis Barnes	Thank you for the opportunity to provide comment on the Tesoro Refinery's proposed expansion project. The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance.	Thank you for your comment.
Ch09-128	J Lukas	[Xylene] Being highly volatile, and a hazardous substance means that the refinery needs to insure that the health and well being of anyone that may come into contact of these chemicals.	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating the health and safety of workers and the community is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-129	Laura Berg	Xylene is a highly volatile and hazardous substance and the DEIS	Thank you for your comment.

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		does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export it at all - let alone expand what they are doing already.	
Ch09-130	Kurt Waldenberg	Thanks for your effort, time and attention to ensure public health and safety, which are at risk if the proposed project is implemented.	Thank you for your comment.
Ch09-131	Mary Brady	I am concerned about the flammability of xylene and the dangers that would pose to the workers at the refinery and the community.	<p>Xylenes have a similar flammability to gasoline, already in production at the refinery (see Section 9.6.1 of the Draft EIS). The refinery has systems in place designed to properly handle flammable materials (including xylenes), prevent releases, control worker and community exposures, and respond to incidents.</p> <p>The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular training drills. Additional information regarding emergency response coordination between the refinery and the local communities is provided in Section 3.7.1 of this Final EIS.</p>
Ch09-132	Glen Anderson	The DEIS does NOT clearly show that Tesoro's Anacortes Refinery can SAFELY manufacture and export xylene.	Thank you for your comment.
Ch09-133	Sigrid Asmus	The DEIS does not include a thorough review of the safety requirements and full impacts of the project.	Thank you for your comment.
Ch09-134	Gary McCabe	I do not think the upgrade should be done. There have been too many safety issues in the past with the plant...	<p>The refinery's past safety history and measures that have been implemented to address past safety issues are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls – Section 2.7.6 • Operational site controls – Section 2.8.5 • Potential impacts of unplanned events, including explosions – Section 9.6 • Coordination and training between Tesoro and local

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			<p>emergency service providers – Section 11.4</p> <ul style="list-style-type: none"> Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Ch09-135	John McCollister	<p>My research on the potential dangers of Xylene in our land and water sources, makes me a no vote on the production plans for adding a Xylene plant at Tesoro. I live in Anacortes, and feel the risk of this causing problems in our community is just too great.</p>	<p>The Draft EIS provides an analysis of the potential for a xylene spill and the potential harm that a xylene spill could cause to both land and water resources. The proposed project is designed to contain spills at the refinery and spill detection devices to alert workers in the event of a spill. Spills of xylene within the developed portions of the refinery would be contained and cleaned up or routed to the refinery’s wastewater treatment plant. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of xylenes are administered by the U.S. Coast Guard, Washington State Department of Ecology, and U.S. Environmental Protection Agency (see Sections 3.1, 5.1, and 13.1 of the Draft EIS).</p> <p>The measures in place to prevent and respond to a spill at the refinery or in the marine environment are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A Vessel safety and waterway management – Section 13.4.1.2 Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The potential impacts from a spill to land and water sources are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Geologic resources, including soils – Section 3.3.2.3

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			<ul style="list-style-type: none"> • Freshwater resources – Section 5.3 • Groundwater – Section 5.4 • Wetlands – Section 5.5 • Marine waters – Section 7.4 • Land use and shoreline use – Section 10.3 <p>Marine spill risks, prevention, and cleanup measures are detailed in:</p> <ul style="list-style-type: none"> • Spill likelihood and spill response are discussed in Sections 13.5.6 and 13.5.7 • Spill prevention measures are provided in Appendix 2-A, and in Section 13.4, which details vessel safety requirements
Ch09-136	Mary Sinker	<p>Xylene is dangerous and if this project moves forward, the highest standards for worker safety, environmental health, and public health must be specified and rigidly maintained during all aspects of this project. This includes the expansion phase as well as the transport, refining, and shipping of xylene and the materials needed to produce xylene. The Final EIS must contain language that enforces the strict adherence to the highest possible standards for worker, environmental, and public health safety.</p>	<p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, the environment, and human health.</p> <p>Further details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for regulating worker health is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts on environmental health is provided in Section 3.6 of this Final</p>

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			EIS.
Ch09-137	Mary Sinker	If the project moves forward, I believe the Final EIS must include specific provisions to protect workers, the environment, and public health during all phases of this proposed project.	<p>Worker health and safety is managed in accordance with WISHA of 1973 enforced by the Washington State Department of Labor and Industries, DOSH. DOSH periodically inspects the facility to confirm that Tesoro is in compliance with applicable regulations and permit conditions.</p> <p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Laws, regulations and guidance for the protection of human health – Section 9.1 <p>Additional information regarding agencies responsible for protecting worker health and safety is provided in Table 2 in</p>

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			Section 3.1 of this Final EIS. Additional information regarding potential impacts on environmental health is provided in Section 3.6 of this Final EIS.
Ch09-138	Marnie Pennington	I do not want our county to move into a new project with a very questionable health harming chemical, with a company that does not seem to "play by the regulations". Capturing and shipping the xylene will only pass along the risk and results to people while financially benefiting the company. Not good.	Thank you for your comment.
Ch09-139	Ruth Holder	<p>Tesoro's management of the safety risks of every process and every unit for this project should be a key part of the EIS, but the Draft EIS, while acknowledging the 2010 incident, unacceptably shuts refinery workers and contractors out of the health impacts analysis. It underplays the Chemical Safety Board's report that followed the 2010 incident. And the DEIS fails to connect the dots between workplace safety and community safety. The result? Dubious findings of "less than significant" impacts, that foreclose conditions or mitigations to improve worker and community safety.</p> <p>The time to ensure worker, community, and environmental safety at this refinery is now. Decision makers must require a strong, mandatory Process Safety Management program that expressly applies to the entire proposed project. Tesoro's current PSM program, though improved after the Chemical Safety Board report, is not mandatory, and improvements may or may not be applied throughout the project or over the life of the project.</p> <p>The Final EIS must dive deep into the Chemical Safety Board findings and recommendations, and fully support conditions and mitigations that require full implementation of those recommendations point-by-point.</p>	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations). Coordination and training between Tesoro and local emergency service providers is discussed in Section 11.4 of the Draft EIS. Additional information regarding emergency response planning and coordination with local services is provided in Section 3.7.1 of this Final EIS.</p>

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Ch09-140	Mike Levine	And designing and manufactured here will be done so safely under Washington and federal regulations, as compared to elsewhere in the world where it may not have the same restrictions.	Thank you for your comment.
Ch09-141	Steven Elliser	I do firmly believe it is a completely safe project.	Thank you for your comment.
Ch09-142	Libby Mills	I disagree with many of the conclusions that I've read on the environmental impact statements, all the information sheets about the insignificance of the impacts of this project. So, I'm testifying with my concerns for safety.	Thank you for your comment.
Ch09-143	Ruth Holder	<p>Tesoro's management of the safety risks of every process and every unit for this project should be a key part of the EIS. But the Draft EIS, while acknowledging the 2010 incident, unacceptably shuts refinery workers and contractors out of the health impacts analysis. It underplays the Chemical Safety Board reports that followed the 2010 incidents, and the DEIS fails to connect the dots between workplace safety and community safety. The result: Dubious findings of, quote, less than significant impacts that foreclosed conditions or mitigations to improve worker and community safety. The time to ensure worker, community, and environmental safety at this refinery is now. Decision-makers must require a strong mandatory process safety management program that expressly applies to the entire proposed project. Tesoro's current PSM program, though improved after the Chemical Safety Board report, is not mandatory; and improvements may or may not be applied throughout the project or over the life of the project. The Final EIS must dive deep into the Chemical Safety Board findings and recommendations and fully support conditions and mitigations that require full implementation of those recommendations point by point.</p>	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations). Coordination and training between Tesoro and local emergency service providers is discussed in Section 11.4 of the Draft EIS. Additional information regarding emergency response planning and coordination with local communities is</p>

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			provided in Section 3.7.1 of this Final EIS.
Ch09-144	Carol Thibeau	EIS draft did not include; ... Cumulative impact on health	Cumulative impacts to human health and safety are discussed in Section 9.7 of the Draft EIS.
Ch09-145	Gordon Zurn	The potential positive impacts of the overall safety and efficiency of Tesoro Anacortes refinery as a result of the significant capital investment that is proposed should not be overlooked. New modern process units and related equipment should be more efficient, easier to control, and safer than older engine equipment. We recognize that the model design -- when done properly -- allows for opportunity to eliminate, minimize, and monitor potential risk. As a result -- or excuse me -- is a reality far superior to the need to mitigate excessive risk related to aging equipment and antiquated design. New equipment and control systems design should be determined using model process safety concepts, such as inherent safety design and hierarchy of control analysis, in order to reduce the risk to as low as reasonably practical.	The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.
Ch09-146	Bruce H Gillett	And I believe that the environmental and safety risks that have already been talked about here are controllable. They're -- they can mitigate it, and they will be managed appropriately. I'm not saying that all of this is risk-free. A refinery project isn't risk-free; but, in fairness, nothing in life is. That holds true in our everyday lives as well. I see the risks as minimal. I believe they would be appropriately handled.	Thank you for your comment.
Ch09-147	Barbara O'Steen	Xylene is a flammable and dangerous petrochemical. We do not need to endanger the health and safety of the whole planet in order for you to profit on shipping something dangerous to China.	Thank you for your comment.
Ch09-148	Valerie Rose	The EIS must include:	The proposed project would not increase transport of crude oil by

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		<p>1) Foolproof safety measures to protect refinery workers, Skagit County residents, and ecosystems along the path of the rail line transporting crude oil to the refinery, and the path of the tankers exporting xylene to Asia.</p>	<p>rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>If a spill were to occur along the marine vessel transportation route, the potential impacts to residents and ecosystems are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3 • Special status species (including marine birds, shorebirds,

ID	Contact	Comment Text	Response
			<p>waterfowl, and other marine wildlife species) – Section 6.5</p> <ul style="list-style-type: none"> • Marine and nearshore resources – Section 7.4.3 • Human health – Section 9.6.2
Ch09-149	Lin McJunkin	<p>my main objection to the proposal lies with actual health dangers.</p> <p>According to the Agency for Toxic Substances and Disease Registry, a division of the Centers for Disease Control and Prevention, the health of Tesoro workers who will come into direct daily contact with the chemical process, as well as the health of people in neighborhoods near the processing plants both locally and abroad where the xylene will be shipped, could be affected, although there have not been enough studies to determine if those risks include cancer. (Agency for Research on Cancer) The Environmental Impact Statement needs to analyze the effects of exposure to xylene, particularly on Tesoro workers, both in the short and long terms.</p>	<p>Xylene is not listed as a carcinogen by the USEPA in their Integrated Risk Information System database on toxic effects because the USEPA considers the strength of the data to demonstrate a link between cancer and xylene exposure is not sufficient. There is some scientific data indicating there may be a link between xylenes and cancer, and research is ongoing. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-150	Georgianna Morgan	<p>5) what additional plans will be in place to warn and protect the community from a possible contamination. Will additional facilities be needed to get people into..</p>	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health, as provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-151	Veronica Bush	<p>Tesoro's safety record is checkered, and with the risks to the local community, I do not believe that this proposal is a go.</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5

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			<ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7
Ch09-152	Deborah Javelet	I just wanted to pass along my concerns about the introduction of Xylene into our Anacortes community...I think the health risks of introducing and producing this product far out weigh the few jobs it will create.	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformat) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformat to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A

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			<ul style="list-style-type: none"> • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-153	Deborah Javelet	<p>This letter is to express my concern for those of us negatively impacted by the introduction of Xylene into our community...even if it is limited entirely to the facility, which is always a CLAIM by those wishing to do such things. History has shown us that this is rarely the case.</p> <p>I would not like to see this expansion of the production of Xylene done in our community.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil

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			<p>spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-154	Kate Waind	The people of Washington state deserve jobs and an environment that are not harmful to their health.	<p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Potential impacts to human health and the measures in place to help protect human health and safety are discussed in Chapter 9 of the Draft EIS.</p>
Ch09-155	Sandra Kraus	In short, I am not confident in Tesoro’s ability to make this upgrade with any assurance that the residents and wildlife of the affected areas and beyond will be safe.	<p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the local residents and wildlife. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A <p>Additional information regarding agencies responsible for protecting human health and wildlife is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch09-156	Gary McCabe	I do not think the upgrade should be done...the potential risks to people in the area from extra ships, leaks, releases and numerous other scenarios makes it far too risky to proceed.	<p>The Draft EIS provides an analysis of the risk and potential impacts to people from increased marine vessel traffic and from leaks and releases. The likelihood and potential impacts associated with a spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. The increase in marine vessel traffic as a result of the proposed project is discussed in Section 13.3. Cumulative impacts from marine transportation including vessel traffic, vessel safety, and spill risks are discussed in Section 13.6.</p> <p>Spill prevention and response measures in place (available response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Potential impacts to people from extra ships, leaks, and releases are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Potential impact from air emissions – Section 9.3.2.2 • Potential impacts from increased traffic – Section 9.4.2 • Potential impacts from project and vessel noise – Section 9.5.2 • Potential impacts from fires, leaks, and releases – Sections 9.6.2 and 9.6.3 <p>Additional information regarding marine transportation including vessel traffic, spill modeling, likelihood and response, is provided in Section 3.9 of this Final EIS.</p>
Ch09-157	James MacRae	If Tesoro wants to produce 15,000 barrels per day of mixed xylenes, these explosive materials will have to be transported to	Land transportation would be used to deliver some chemicals of low flammability to the refinery that would be used in the xylenes

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		<p>the site in Skagit. That's a major issue for anyone living along the transportation route.</p>	<p>manufacturing process (sulfolane, ammonia, and perchloroethylene). The transport of xylenes from the local area would consist of loading vessels at the refinery wharf. The vessels would transport xylenes from the refinery wharf to world markets via the southern portion of Rosario Strait and the Strait of Juan de Fuca.</p> <p>The Draft EIS discusses modes of transport used for the shipment of materials to the refinery associated with the proposed project, as well as the export of mixed xylenes from the refinery, in Chapter 2. The potential for incidents on land or at sea, including the potential risk of explosion and the safety measures in place to prevent incidents, was analyzed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding the marine transportation analysis is provided in Section 3.9 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessel transit is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-158	Liz Spoerri	<p>The problem with manufacturing xylene is that it releases toxins in the air and water and is colorless. Exposure results in breathing difficulty, memory loss, depression and insomnia. It is a danger to workers and communities.</p>	<p>In general, the proposed project is not likely to produce xylene emissions. Xylene would be released to the air in the event of a spill, followed by the evaporation of xylene to air. The impacts associated with a xylene spill and subsequent evaporation to air are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Potential impacts on air quality from a xylene spill – Section 4.4.4.2

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			<ul style="list-style-type: none"> • Potential impacts on terrestrial wildlife and marine birds from a xylene spill – Section 6.4.3.3 • Potential impacts on health from a xylene spill – Section 9.6.2 • Xylene spills in the marine environment – Section 13.5 <p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Discussion of the toxicity of xylene (and reformate) to humans – Section 9.6.2 <p>Additional information regarding environmental health is provided in Section 3.6 of this Final EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to comply with these requirements as well as emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>Complaints about air quality problems can be submitted to the NWCAA complaint website (http://nwcleanairwa.gov/permits-and-services/enforcement/complaints/).</p> <p>Additional information regarding agencies responsible for regulating safety practices and human health at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch09-159	Rebecca Canright	Xylene also poses a significant threat to public health; even just short-term exposure causes memory loss, nausea, insomnia and other illness.	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The toxicity of xylenes (and reformate) to humans is discussed in Section 9.6.2 of the Draft EIS.</p> <p>The refinery's safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding xylene toxicity is provided in Sections 3.5.2 and 3.6 of this Final EIS. Additional information regarding agencies responsible for protecting human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-160	Lorraine Hartmann	In a family with blood cancer, we know the hazards of such chemicals	<p>Xylene is not regulated as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene and, in addition to these impacts, it may be carcinogenic in humans. A discussion of the toxicity of xylene (and reformate) to humans is discussed in the following sections:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Sections 2.7.6 and 2.8.5 • Potential impacts from unplanned events, including explosions – Section 9.6 • Coordination and training of Tesoro and local emergency service providers – Section 11.4

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			<ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Additional information regarding environmental health is provided in Section 3.6 of this Final EIS. Additional information regarding agencies responsible for regulating safety practices and human health at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-161	Joan Cross	As you know Xylene is highly flammable, evaporates at low temperatures and spreads its NeuroToxin quickly around its neighborhood. That neighborhood is our community. Say NO to Xylene.	<p>Xylenes are flammable and have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS). Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as discussed in Section 9.6.2.1. All xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The toxicity of xylenes to humans during potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. A discussion of the toxicity of xylene (and reformate) to humans is discussed in the following sections:</p> <p>Human health (air emissions and spills) – Sections 9.3 and 9.6.2 Spills and information on toxicity – Section 13.5</p> <p>Additional information regarding impacts to environmental health is provided in Section 3.6 of this Final EIS.</p>
Ch09-162	Clarity Miller	[Xylene] is dangerous and irresponsible to build a plant which will produce a known neurotoxin so close to a heavily populated area. It is a threat to our health and our children’s health, as well as to the environment.	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The toxicity of xylene (and reformate) to animals and humans is discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Humans – Section 9.6.2.1 <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to discuss safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding xylene toxicity is provided in Sections 3.5.2 and 3.6 of this Final EIS. Additional information regarding agencies responsible for regulating safety practice, human health, wildlife, and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-163	Sarah Sibley	I am opposed to Tesoro building a production facility that produces Xylene. This is a neurotoxin can produce many, many - a long list - of health problems for surrounding communities.	The toxicity of xylenes (and reformate) to humans is discussed in Section 9.6.2 of the Draft EIS. Additional information regarding environmental health is provided in Section 3.6 of this Final EIS.
Ch09-164	Anonymous	Yes I'm a resident living on Fidalgo Island, south of the refinery, and I just want to state that I think a handful of jobs is not worth the health and welfare of the people that live here.	Thank you for your comment.
Ch09-165	Alberta Finley	The hazards of xylene are well documented:	The toxicity of xylenes to humans from potential exposure during

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		It is toxic [and] Burns easily	<p>operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The toxicity of xylene (and reformate) to humans is discussed in Chapter 9 of the Draft EIS. Xylenes are flammable and have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS).</p> <p>Additional information regarding xylene toxicity is provided in Section 3.6 of this Final EIS.</p>
Ch09-166	Alberta Finley	<p>The hazards of xylene are well documented:</p> <p>...</p> <p>Dangerous to the general population</p>	Thank you for your comment.
Ch09-167	Phyllis Dolph	Some risks are too much for the communities where not only marine life lives, but also human populations.	<p>The Draft EIS discusses the potential impacts of the proposed project and the measures that would be taken to avoid or reduce any potential impact.</p> <p>Details about control measures that would be taken to protect people and marine life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections – Appendix 2-A • Marine life – Sections 6.4 and 7.4 • Water quality – Chapter 5 and Section 7.4 • Human health – Chapter 9 • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding marine and nearshore resources and environmental health is provided in Sections 3.5 and 3.6 of this Final EIS.</p>
Ch09-168	Phyllis Dolph	The final EIS should include health effects of xylene...	The toxicity of xylene (and reformate) to animals and humans is

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			<p>discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding environmental health and xylenes is provided in Section 3.6 of this Final EIS.</p>
Ch09-169	Phyllis Dolph	When inhaled or ingested, xylene can be moderately toxic to a human's central nervous system.	<p>Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes in Chapter 9. All xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The toxicity of xylene (and reformat) to humans is discussed in Section 9.6.2.1, and impacts to human health from air emissions is discussed in Section 9.3.2.2 of the Draft EIS.</p> <p>Additional information regarding xylene toxicity is provided in Section 3.6 of this Final EIS.</p>
Ch09-170	Steve Knutsen	The entire project will involve more risk of poisoning our air, water and land, our lungs, our hearts. Every aspect of the project increases the danger of death to us and our neighbors. It cannot be made safe. Do not allow this to go on.	<p>Details about control measures and safety practices at the refinery and the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2

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			Additional information regarding agencies responsible for regulating safety practices and human health at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch09-171	Judy Hammer	[Submitted at public hearing as research to support comments: Invstiation of VOCs associated with different characteristics of breast cancer cells. Luca Lavra1, Alexandro Catini, Alessandra Ulivieri1, Rosamaria Capuano, Leila Baghernajad Salehi\ Salvatore Sciacchitano1, Armando Bartolazzi, Sara Nardis6, Roberto Paoless6, Eugenio Martinelli, Corrado Di Natale]	Xylene is not regulated as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene and, in addition to these impacts, it may be carcinogenic to humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding the potential for xylenes to cause cancer in humans is provided in Section 3.6 of this Final EIS.
Ch09-172	Dennis Parent	More specifically I do not want a neurotoxin plant anywhere near my family or neighborhood. I don't want the risk of an explosion, as happened in a Chinese xylene plant repeatedly.	<p>The Draft EIS discusses the toxicity of xylene (and reformate), impacts to human health, potential impacts from unplanned events (including fires, explosions, and spills), as well as control measures and response resources in the following sections:</p> <ul style="list-style-type: none"> • Toxicity of xylenes and reformate – Section 9.6.2.1 • Impacts to human health – Section 9.3.2 • Potential impacts from unplanned events – Section 9.6 • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding xylene toxicity and safety considerations is provided in Section 3.6 of this Final EIS. Additional information regarding agencies responsible for regulating safety practices and human health at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-173	John Janson	I am one of those who thinks there are very good reasons to proceed with certain elements of the project as outlined. those relate to upgrades in both public safety and that of the workers in terms of aging equipment and the improvements technology now	Thank you for your comment.

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		that allows for cleaner and kinder effects on the environment....people, our land, air and water and plant and animal life in the affected area.	
Ch09-174	Judy Hammer	[Submitted at public hearing as research to support comments: Investigation of biomarkers for discriminating breast cancer cell lines from normal mammary cell lines based on VOCs analysis and metabolomics. Yanping Huang,ab Yu Li,b Zewei Luob and Yixiang Duan*b]	Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-175	Judy Hammer	[Submitted at public hearing as research to support comments: CHEMICALS IN PERSONAL CARE PRODUCTS AND BREAST CANCER. MASSACHUSETTS BREAST CANCER COALITION]	Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-176	Judy Hammer	[Submitted at public hearing as research to support comments: Assessment of Impacts Produced by Anthropogenic Sources in a Little City near an Important Industrial Area (Modugno, Southern Italy). Martino Amodio, Gianluigi de Genmw, Annalisa Marzocca, Livia Trizio, and Miaria Tutino]	Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-177	Judy Hammer	[Submitted at public hearing as research to support comments: Centers for Disease Control and Prevention - Xylene]	The refinery has systems in place designed to properly handle xylenes on site, prevent releases, control worker exposures, and respond to incidents. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.
Ch09-178	Judy Hammer	[Submitted at public hearing as research to support comments: Material Safety Data Sheet. Avantor]	Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-179	Judy Hammer	[Submitted at public hearing as research to support comments: Safety Data Sheet. Chevron Phillips]	Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-180	Judy Hammer	[Submitted at public hearing as research to support comments:	Additional information regarding xylene as a human carcinogen is

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		Safety Data Sheet. Citgo]	provided in Section 3.6.1 of this Final EIS.
Ch09-181	Judy Hammer	[Submitted at public hearing as research to support comments: Right to Know: Hazardous Substance Fact Sheet NJ Health]	<p>The Draft EIS describes the toxicity of xylenes to humans, marine birds, and aquatic life in Sections 9.6, 6.4.3.3, 7.4.3.2, respectively. Additional information regarding xylene toxicity to humans and aquatic species is provided in Sections 3.6 and 3.5.2 of this Final EIS.</p> <p>Additional information regarding agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of the Final EIS.</p>
Ch09-182	Judy Hammer	[Submitted at public hearing as research to support comments: What is Xylene? The Pollution Lawyers]	<p>The Draft EIS describes the toxicity of xylenes to humans, marine birds, and aquatic life in Sections 9.6, 6.4.3.3, 7.4.3.2, respectively. Additional information regarding xylene toxicity to humans and aquatic species is provided in Sections 3.6 and 3.5.2 of this Final EIS.</p>
Ch09-183	Judy Hammer	[Submitted at public hearing as research to support comments: Painter's Suit Ties Solvents to Cancer. Paint Square]	<p>Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.</p>
Ch09-184	Jean Bernanke	<p>NO NO NO - DO NOT APPROVE the production of this product, it is cancer causing, explosive, disastrous.</p> <p>Have some sense, do your job, protect your district and population. We are counting on you to do the right thing.</p> <p>Please protect our personal and environment health which is one in the same.</p> <p>Do not allow this production here, set a precedent for the nation, for the world to ban XYLENE production.</p>	<p>Thank you for your comment.</p>
Ch09-185	Judy Hammer	<p>I specifically researched CANCER links to Xylene. I presented several statistics/quotes from reputable, respected organizations pertaining to brain, lung, breast, and blood cancers resulting from VOCs (Volatile Organic Compounds) at the public-comment hearing in Anacortes on April 17, 2017. The EPA lists Xylene as a Top Ten Carcinogen. Alarming sobering information. I officially submitted to Skagit County the cancer information. I hope you all</p>	<p>The toxicity of xylenes (and reformate) to humans is discussed in Section 9.6.2 of the Draft EIS. Xylene is not listed as a carcinogen by the USEPA in their Integrated Risk Information System database on toxic effects because USEPA considers the strength of the data to demonstrate a link between cancer and xylene exposure not sufficient. There is some scientific data indicating there may be a link between xylenes and cancer, and research is</p>

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		will read it. We are ALL at risk -- the community, the employees who produce Xylene. I wonder if all of those who have written in support of this facility will feel so enthusiastic after they get cancer? Was the money really worth it ?	ongoing. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-186	Karen McCallum	Is there a plan that can show the safety measures that will be in place to protect the citizens who work at Tesoro and who live in the area if this production occurs?	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). The process safety management program is required by Washington State’s Department of Labor and Industries (L&I) under WAC 296-67, and L&I is responsible for ensuring the compliance with the regulation. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. L&I establishes and enforces work place safety requirements, the refinery must be in compliance with those regulations independent of any EIS or other permitting regulatory process. The changes in refinery operations are not substantially different from current refinery operations with regards to handling of flammable materials, training about and protection from hazardous materials, and use of personal protective equipment for hazardous tasks. Tesoro is required by L&I to protect their workers from workplace hazards and update safety programs as needed to cover all operations.</p> <p>Further details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4

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			<ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4.1.2 <p>Additional information regarding Tesoro’s emergency response planning is provided in Section 3.6.3 of this Final EIS. Additional information regarding the agencies responsible for regulating the health and safety of workers and the community is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-187	Judy Hammer	"Toxic Air Please No Cancer Prayer" is the White Elephant in Skagit County's living room.	Thank you for your comment.
Ch09-188	Sarah Lou Weber	Xylene is a neurotoxin that causes a long list of serious problems, both short and long term, the worst of which is kidney and liver damage, heart problems, brain/memory/ thinking problems, and basically our ability to use our muscles. All of our organs are effected. Prolonged exposure is deadly. Thank you for taking our family and communities health and well being into consideration. -	Thank you for your comment.
Ch09-189	Cathy Schoenberg	Xylene is extremely toxic and should be banned... period.	Thank you for your comment.
Ch09-190	Elizabeth Scholze	<p>As a public health expert, my deepest concerns are strictly related to the health of our community and neighbors. Xylene is a highly toxic neurotoxin, which means it has potentially catastrophic effects on the human body and nervous system. (It has those same effects on other mammals, including horses, cattle and dogs and cats. It may even have those affects on chickens and other fowl, and thus can potentially contaminate the food chain. (Darbon, 2016).</p> <p>Studies have indicated that xylenes in air can be smelled at concentrations as low as .08 to 3.7 ppm, and can be tasted in water at .53 to 1.8 ppm. (Kandyala, Reena; Raghavendra, Sumanth Phani C.; Rajasekharan, Saraswathi T. (2010). "Xylene: An overview of its health hazards and preventive measures". J Oral Maxillofac Pathol. 14 (1): 1–5.</p> <p>This can have dire consequences for asthma, bronchitis and teeth and gums as well as the entire digestive system. In fact, neurotoxins can have extremely deleterious effects on other</p>	<p>The toxicity of xylenes to humans is discussed in Section 9.6.2 of the Draft EIS and the Draft EIS also considered the risks of a fire or explosion in Section 9.6. Xylene is not classified as a carcinogen by the USEPA in their Integrated Risk Information System database on toxic effects because USEPA considers the strength of the data to demonstrate a link between cancer and xylene exposure not sufficient. There is some scientific data indicating there may be a link between xylenes and cancer, and research is ongoing. Additional information regarding xylene as a potential carcinogen is provided in Section 3.6 of this Final EIS.</p> <p>All xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p> <p>Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the</p>

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		<p>organs as well, including liver, kidneys, heart, and central nervous system.</p> <p>Some studies have found cases of occupational neuropathy, and ototoxicity is found in experimental animals.</p> <p>The National Institute of Health reports that there are both acute health effects of xylene and other solvents (including headache, dizziness, unconsciousness, seizures and death eye, nose and throat irritation.) Additionally, the risk of fire and explosion can involve the loss of life or the rise of disability.</p> <p>The long term affects, as reported by the NIH, include leukemia, scleroderma, renal cancer and the possibility of chronic toxic encephalopathy, and a decline in cognitive function.</p>	<p>refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-191	Anne Cox	<p>The environmental health impacts are listed as less than significant. I believe that is overly optimistic, and it only takes one explosion or one spill. As someone with serious asthma, I am concerned!</p>	<p>Thank you for your comment.</p>
Ch09-192	Janet Alderton	<p>I live on Orcas Island, in the San Juan archipelago. Tankers and barges travel past the San Juan Islands through narrow and hazardous marine passages. I have asthma and am very sensitive to volatile organic chemicals. A large spill of reformate or mixed xylenes as a result of vessel collision or grounding would adversely affect me and many others. The benzene content of reformate makes it carcinogenic, meaning it causes cancer. Benzene is highly carcinogenic and is a threat to first responders to a spill, as well as to residents in the area of the spill.</p>	<p>The Draft EIS concluded that a large spill of xylenes or reformate would potentially impact human health, depending on the volume and location of a spill. The Draft EIS listed the many safety measures and response mechanisms that are in place to prevent a spill and mitigate a spill should one would occur (see Section 13.5). The proposed project does not significantly increase the risk of a spill above the risk already present due to the current tanker traffic (see Section 13.5.6 of the Draft EIS). Benzene is not a component of either the reformate mix or the mixed xylenes that would be shipped on vessels (see Table 2-1of the Draft EIS).</p> <p>Additional information regarding agencies responsible for regulating human health and marine vessel transport is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-193	Steve Garey	<p>The significant level of new capital investment that is proposed also has the potential to make the refinery safer, more efficient, and easier to monitor and control -- another important benefit for</p>	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to</p>

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		workers at our community and the environment. In order to realize these benefits, however, the Final EIS should require that modern process safety management concepts, such as inherently safer design and hierarchy of controls analysis, is applied to the design construction of the new units so as to reduce risk to as low as reasonably possible.	prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.
Ch09-194	Annabelle Fox	Xylenes are flammable and toxic to humans and ecosystems. The risk of exposure from five and a half million barrels of xylene per year is not needed. We already have 120,000 barrels of oil coming here daily via ship, pipe line, and rail. We have a history of explosions and toxic waste.	Thank you for your comment.
Ch09-195	Evelyn Adams	Tesoro will be refining and transporting a substance listed by the federal Agency for Toxic Substances and Disease Registry as having several known and suspected health risks to humans. Exposure to xylene has also resulted in a range of serious effects to animals, and, as noted in the Journal of Oral and Maxillofacial Pathology	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes are provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transport, air emissions, and human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch09-196	Bob Hall	<p>10. Xylene is another chemical that we humans might be better off not using. Alternatives are being created. Should Anacortes become the location for another facility that manufactures and/or handles toxic chemicals and products? Is this our future? I don't think so. Our marine setting and marine resources are far too valuable to take another risk.</p>	Thank you for your comment.
Ch09-197	Christine Damarjian	<p>I recently bought a box of chalkboard markers from a box store. In big print on the package, it read "Xylene-Free". Whiteboard markers used in public school no longer contain xylene. (In the old days, twenty-four students opening their markers made everyone a bit queasy.)</p> <p>Manufacturers are highlighting 'xylene-free' as a selling point. Their corporate awareness of public response demonstrates a concern for their bottom line. With even more products are labeled "xylene-free", what is the rationale for refitting a facility refitted to produce xylene? Twenty jobs for a product that has a diminishing market?</p>	Thank you for your comment.
Ch09-198	Constance Snell	<p>Maybe, we should consider who will benefit if the xylene facility is denied. Potent i.e. workers will benefit from less sickness and disease associated with xylene. We, citizens, will benefit from less exposure to toxic chemicals. Children, in particular, will benefit, as their developing bodies and brains are more vulnerable to air pollution.</p>	Thank you for your comment.
Ch09-199	Joan Edwins-Petrick	<p>I am adamantly opposed to the Tesoro proposal for a xylene facility. A proven neurotoxin and a highly dangerously flammable facility should be enough everyone to realize this is NOT something our community needs.</p>	Thank you for your comment.
Ch09-200	Dulcie Entermann	<p>At least there should be a full impact study and all the research should be made public about this toxic material.</p> <p>Thank you for giving this serious thought and action.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3

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			<ul style="list-style-type: none"> • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p>
Ch09-201	Cheryl Harrison	Thank you for your work. Yours is a very important job as the health and safety of the people of this valley depend on your work and judgement.	Thank you for your comment.
Ch09-202	Lawrence Bullis	When I was a young man, I was a silkscreen printer and photo etcher. I thought xylene was great, because it enabled me to keep my screens clean, when the ink (actually paint) began to set up and plugged the fine mesh. I bought it in 5 gallon quantities and kept it around my home. After a while, thinking of my small children, I changed my tune. I realized that it, along with some other very toxic substances that I was using, couldn't be contributing to our well being. I suspect that I was smarter before I started using it than I am now, due to its affect on my brain, but maybe not smart enough to have left it well enough alone at the time.	Thank you for your comment.
Ch09-203	Martha Hall	<p>12. Xylene is not a product to be proud of even though it is used for many things.</p> <p>I don't like the idea of Anacortes adding another dangerous, toxic chemical to its list of products, along with refining crude oil. This is not a great future for our Anacortes or the Salish Sea. We will have other dangerous chemicals shipped in from other places including California to make xylene. These could end up in the Salish Sea.</p> <p>Other products are being created that are less dangerous than xylene. Sometime we may find that its use is no longer allowed in Washington State. Are 20 jobs really worth this threat? I don't think so. We can do better.</p>	Thank you for your comment.

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Ch09-204	Jim Katrien	I've been a long-time resident of Skagit County. And I want the EIS to talk about cancer rates in Skagit County. And I want everybody who's thinking -- so like it's -- it's just nothing, these little increases in chemicals and -- Cancer rates in Skagit County are higher than most of the counties in Washington, and it's because of these refineries.	<p>Skagit County cancer incidence rates are discussed in Section 9.3.1.2 of the Draft EIS and the County rates were compared to Washington State as a whole. Skagit County is ranked as having the fourth highest total cancer incidence rate out of the 39 counties in the state; however, recent data indicate the cancer rate is falling in the County (National Cancer Institute Data for 2010-2014). Skagit County has a larger percentage of their population over 65 years of age than Washington State as a whole. While many complex factors contribute to cancer, cancer is the second leading cause of death in the United States and an older population would have higher cancer rates, other factors being equal. Life style choices, age, and genetic factors can all contribute to causes of cancer in addition to environmental pollution.</p> <p>Additional information regarding the agencies responsible for regulating human health is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.</p>
Ch09-205	Joan Edwins-Petrick	A proven neurotoxin and a highly dangerously flammable facility should be enough for you to realize this is NOT something our community needs.	Thank you for your comment.
Ch09-206	Patricia Resseguie	Tesoro does not have a stellar record for safety, especially in the production of xylene. Do not give them an opportunity to pollute the environment and endanger us further.	Thank you for your comment.
Ch09-207	Peregine O'Gormley	And this proposal -- I'm just going to comment on one particular thing that's going on. We came in late, so I'm sure it's already been commented on. But the production of xylene is particularly dangerous. I think everybody's -- if you haven't looked at what it is and what it does, it's a pretty nasty neurotoxin. And we don't need that in Skagit County. ...We don't need to be bringing in jobs that poison all of us and that create kind of long-lasting damage to the -- for instance, just -- affecting our brains. Those are pretty instrumental in our daily function. So, certainly, let's look at this --	<p>Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the</p>

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		<p>that one in particular, as something that we don't need in this county.</p>	<p>following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 in this Final EIS.</p>
Ch09-208	Judy Hammer	<p>The information is -- this is from scientific reports -- the title, "Investigation of BOCs Associated With Different Characteristics of Breast Cancer Cells." Quote, the diag -- this is from August 2015 -- the diagnostic accuracy of BOCs detected in the breath of patients during breast cancer lesions has been extensively analyzed. The BOCs with abundance significantly increases in cancer cells are four hydrocarbons. Xylene has been named as one of these hydrocarbons. Xylene has been previously detected in breast samples -- breath samples of breast and lung patients. The Center - this is a different report -- the Center for Disease Control and Prevention states -- as well as the National Institute for Occupational Safety and Health -- in August 2002, they published the following statements about xylene specifically: "Avoid exposure in pregnant women. Animal tests show this substance possibly causes toxicity in human reproduction or development. The substance is toxic to (intelligible) organisms." The State of New Jersey Department of Health states, in its Hazardous Substance Fact Sheet, that xylene may damage the developing fetus -- "Do not rely on odor alone to determine hazardous exposure." According to the Alexander Law Group in San Francisco, quote, the</p>	<p>Xylene is not classified as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene. In addition to these impacts, ethylbenzene may be carcinogenic in humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>harmful effects of solvents are cumulative -- which is why cancers do not appear until years or decades after exposure. Larger studies have consistently shown that children -- this is to the Tesoro people -- children who develop brain tumors are more likely to have parents who report spending significant time in jobs, or they have been exposed to solvents. Routine use of solvents containing xylene, benzene, ethylene, and toluene is associated with leukemia and brain cancer. I have far more studies that I will be submitting to the commissioners. I've been doing my homework.</p>	
Ch09-209	Samantha Macintyre	<p>Well, we moved here in 2014. In 2015, I discovered that I had breast cancer. And I know it was coming somehow because I had been a youth worker in Fort McMurry, Alberta in 1968 through to 1972. And the people that I lived with -- I board with a family -- they both died prematurely of cancer -- just down the road when I moved to B.C. -- was Kidamac [phonetic]. I visited Kidamac and Alcan plant, along with some friends of mine, in the 1980s and discovered that most of the fellows that opened that plant were dead by their mid-50s. I had lived and worked in [unintelligible] mill towns in Northern B.C. Cancer rates were very high there. My first husband died of lung cancer. He was a physicist who had put himself through school by working at Dofasco steel plant in Hamilton, Ontario. When I was a family counselor for the Canadian National Institute for the Blind, I was working with multi-handicapped kids and their families. It was interesting, because most of them lived in rural areas in Alberta. But near those rural areas were the gas flares from the oil and gas installations all through Alberta. And when family counselors put pins in the map, where we were finding the highest levels of multi-handicapped kids being born -- gosh, darn, it was right near those gas flares and also right near the -- right near all other high polluters. It wasn't until I read the book by Dr. Sandra Steingraber, who had cancer -- breast cancer and ovarian cancer -- before she was 20, growing up in rural Illinois, that I found out about superfund sites and found out why so many people that I have worked with and lived with have died. And so I want us to pay attention to this. So, her book is called "Living Downstream." Dr. Sandra Steingraber was -- one other person who died is Dr. Theo Colborn. So please take a look at</p>	Thank you for your comment.

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		their books, and you will inform yourself of why.	
Ch09-210	Jeanette Redmond	<p>These are reasons why we do not want Benzene produced in our town. Spills seem to be a daily occurrence in this country and this spells out the dangers:</p> <p>(TESORO does not have a good safety record with several deaths due to explosions a few years back, and many safety violations since).</p> <p>From: http://www.who.int/ipcs/features/benzene.pdf</p> <p>Health effects</p> <p>1. Acute effects</p> <p>? Acute occupational exposure to benzene may cause narcosis: headache, dizziness, drowsiness, confusion, tremors and loss of consciousness.</p> <p>Use of alcohol enhances the toxic effect.</p> <p>? Benzene is a moderate eye irritant and a skin irritant.</p> <p>2. Effects following chronic exposure</p> <p>? Benzene is a well-established cause of cancer in humans. The International Agency for Research on Cancer has classified benzene as carcinogenic to humans (Group 1). Benzene causes acute myeloid leukaemia (acute non-lymphocytic leukaemia), and there is limited evidence that benzene may also cause acute and chronic lymphocytic leukaemia, non-Hodgkin's lymphoma and multiple myeloma. Individuals who have experienced benzene poisoning requiring treatment show a substantially increased risk of mortality from leukaemia.³</p> <p>? Chronic exposure to benzene can reduce the production of both red and white blood cells from bone marrow in humans, resulting in aplastic anaemia.</p> <p>? Both B-cell proliferation and T-cell proliferation are reduced by benzene. Decreased host resistance to infection has been reported in several laboratory animals exposed to benzene. However, other</p>	<p>The reformat mix Tesoro proposes to use includes xylenes as well as other aromatic chemicals such as toluene, trimethylbenzene, ethylbenzene, octane, and isopropylbenzene (see Table 2-1 and Appendix 13-A of the Draft EIS). Benzene is not a component of the reformat mix. The toxicity of xylene (and reformat) to humans is discussed in Section 9.6.2.1 of the Draft EIS.</p> <p>Xylene is not listed as a carcinogen by the USEPA in their Integrated Risk Information System database on toxic effects because the USEPA considers the strength of the data to demonstrate a link between cancer and xylene exposure is not sufficient. There is some scientific data indicating there may be a link between xylenes and cancer, and research is ongoing. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.</p> <p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.</p>

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		measures of immunotoxicity have not been studied.	
Ch09-211	Cathy Schoenberg	Xylene is a neurotoxin , I don't think it is a good idea AT ALL! It's extremely flammable, causes cancer, potential pollution in our sensitive waters. ...What exactly are the cancer risks to workers and the public?	The toxicity of xylenes (and reformate) to humans is discussed in Section 9.6.2 of the Draft EIS. Potential impacts to human health from air emissions are discussed in Section 9.3.2.2 of the Draft EIS. Xylene is not classified as a carcinogen by the USEPA in their Integrated Risk Information System database on toxic effects because the USEPA considers the strength of the data is not sufficient to demonstrate a link between cancer and xylene exposure. There is some scientific data indicating there may be a link between xylenes and cancer, and research is ongoing. Additional information regarding xylene as a potential human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-212	Sue O'Donnell	According to the DEIS, the Xylene process will require the use of benzene. Testimony from one of the speakers declared that benzene is a known carcinogen. What about the other "ingredients" they propose to use to make Xylene for shipping to China. Why is it ok to send a nasty concoction to China? Is it not safe enough for use in our country?	The reformate mix Tesoro proposes to use includes xylenes as well as other aromatic chemicals such as toluene, trimethylbenzene, ethylbenzene, octane, and isopropylbenzene (see Table 2-1 and Appendix 13-A of the Draft EIS). Benzene is not a component of the reformate mix. The toxicity of xylene (and reformate/the reformate mix) to humans is discussed in Section 9.6.2.1 of the Draft EIS. The proposal to ship xylene to Asia is driven by market demand in Asia. Xylene is also used for manufacturing in the U.S.
Ch09-213	Will Golding	What are the potential health risks of this project to the local community? Respiratory problems? Increased cancer rates?	Potential impacts to community health are discussed in Chapter 9 of the Draft EIS. Impacts specifically from xylenes (and reformate) to humans from air emissions in the event of a spill are discussed in Sections 9.3 and 9.6.2 of the Draft EIS. Xylene is not classified as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene. In addition to these impacts, ethylbenzene may be carcinogenic in humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.

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Ch09-214	Larry Pinnow	We whole-heartedly urge you to vote against the permits that would allow Tesoro to produce this dangerous neurotoxin here. Please support the health and safety of this precious area.	Thank you for your comment.
Ch09-215	Millie Magner	Xylene is toxic - protect our communities.	Thank you for your comment.
Ch09-216	Stacy Oaks	Cancer rates need to be a bigger thing that we look at. It should be above the dollar amounts.	Additional information regarding xylene as a human carcinogen is provided in Section 3.6.1 of this Final EIS.
Ch09-217	Phyllis Dolph	<p>Health impacts</p> <p>When inhaled or ingested, xylene can be moderately toxic to your central nervous system. Because xylene is less dense than — so does not dissolve in — water, human and animals are particularly prone to being impacted by a xylene spill on land or in the Salish Sea. The main health effects of inhaling xylene is depression of the central nervous system, with symptoms including headache, dizziness, nausea and vomiting. Long-term exposure may lead to short-term memory loss, among other effects. (National Institute of Health) [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996004/]</p> <p>Results of studies in animals indicate that large amounts of xylene can cause changes in the liver and harmful effects on the kidneys, lungs, heart, and nervous system. Short-term exposure to very high concentrations of xylene causes death in animals, as well as irritation and inflammation of the skin. (Agency for Toxic Substances and Disease Registry) [https://www.atsdr.cdc.gov/toxprofiles/tp71-c1-b.pdf]. There is also evidence of cancer. Parents who bear children will be reportedly prone to having children with brain damage.</p> <p>Please eventually deny this project.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-218	Dustin Small	As shown on page ES-3 of the draft EIS, mixed xylenes are used in many safe, every day household products. They're sold in the paint section of the local hardware store, and are used to make a lot of the outdoor clothing we use here in the Pacific Northwest!	Thank you for your comment.

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Ch09-219	Jim Ciecko	There is little or no discussion of the health issues related to xylene, which is known to suppress the central nervous system even at low exposure levels.	<p>The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding potential impacts from xylenes on human health is provided in Section 3.6.1 of this Final EIS.</p> <p>Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-220	Ronna Loerch	4. Does not address the potential health impacts to people, and wildlife.	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3

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			<ul style="list-style-type: none"> • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p>
Ch09-221	Sara Holahan	<p>In summary, I am very concerned about the production of Xylenes in an environmentally sensitive county which already has a history of dealing with the oil refinery pollution and a higher level of cancers in our population(6th highest rate of 39 counties). I know it's true, as I have recently been treated for cancer myself. Xylene ranked 62 out of 275 on a list of substances with potential threat to human health compiled by the U.S. Agency for Toxic Substances & Disease Registry (http://www.atsdr.cdc.gov/spl/).</p> <p>The main effect of inhaling xylene vapor is depression of the central nervous system, with symptoms such as headache, dizziness, nausea and vomiting. The effects listed below can begin to occur with exposure to air levels of about 100 ppm.</p> <p>https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996004/ According to the Center for Disease Control liquid Xylene easily evaporates and it takes several days of sunlight for xylene to break down in the air. Exposure causes harm to the liver, lungs, kidneys and nervous system. There is indication that it can harm fetuses and get into breast milk.</p>	<p>Skagit County cancer incidence rates are discussed in Section 9.3.1.2 of the Draft EIS and the County rates were compared to Washington State as a whole. Skagit County is ranked as having the fourth highest total cancer incidence rate out of the 39 counties in the state (National Cancer Institute data for 2010-2014); however, recent data indicate the cancer rate is falling in the County. Skagit County has a larger percentage of their population over 65 years of age than Washington State as a whole. While many complex factors contribute to cancer, cancer is the second leading cause of death in the United States and an older population would have higher cancer rates, other factors being equal. Life style choices, age, and genetic factors, can all contribute to causes of cancer in addition to environmental pollution.</p> <p>Xylene is not classified as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. The toxicity of xylene to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding xylene as a potential human carcinogen, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS. Additional information regarding the agencies responsible for air emissions and human health is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-222	John Carrier	Xylene is a toxic, extremely flammable chemical. We should not allow Tesoro's expansion to produce and ship this chemical.	The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Xylenes have a similar

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			<p>flammability to gasoline, already in production at the refinery (see Section 9.6.1 of the Draft EIS). Potential impacts of unplanned events (including spills, fires, and explosions) are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial vegetation and wildlife from fire or explosion – Section 6.4.3 • Human health from fire or explosion – Section 9.6.1 <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-223	Mary Kanter	Long-term exposure to Xylene may lead to headaches, irritability, depression, insomnia, agitation, extreme tiredness, tremors, impaired concentration and short-term memory.	Human exposure to xylenes or reformate can result in toxic effects if concentrations are sufficiently high (see Section 9.6.2.1 of the Draft EIS). Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The toxicity of xylenes and reformate to humans from potential exposure during operation of the proposed project and

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			<p>in the event of a spill was analyzed in the Draft EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-224	CG Wyatt	<p>6. Xylene can be moderately toxic to the human central nervous system. Because xylene is less dense than — so does not dissolve in water, human and animals are particularly prone to being impacted by a xylene spill on land or in the Salish Sea. The main health effects of inhaling xylene is depression of the central nervous system, with symptoms including headache, dizziness, nausea and vomiting. Long-term exposure may lead to short-term memory loss, among other effects. (National Institute of Health)</p>	<p>Human exposure to xylenes or reformatate can result in toxic effects if concentrations are sufficiently high (see Section 9.6.2.1 of the Draft EIS). Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The toxicity of xylenes and reformatate to humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-225	Mary Ratermann	<p>Xylene is an extremely toxic substance that I do not wish to have in my backyard. Perhaps Tesoro is investing in this facility to offset the oversupply we now have of oil, due to other energy sources such as natural gas. In any case, when I read about how toxic xylene is, I see a laundry list of health impacts that are not worth the small economic value gained from its generation.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformatate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformatate to birds and aquatic species in the marine environment</p>

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			<p>is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-226	Washington Physicians for Social Responsibility, Bruce Amundson, Emily Peterson, Laura Skelton	As the project is currently envisioned, the level of threat to human health and safety posed by the Tesoro Refinery’s expansion project is unacceptable. The draft EIS does not include any mitigation measures that would be sufficient to protect human health. Our conclusion is based on our review of the draft EIS document, which revealed the following risks to human health and safety...	Thank you for your comment.
Ch09-227	Protect Skagit, Washington Environmental Council, RE Sources for	<p>A New NPDES Permit is Necessary</p> <p>The Tesoro Xylenes project involves the use of new hazardous and toxic chemicals, including sulfolane, aqueous ammonia, xylenes, perchloroethylene, ethylbenzene, reformates, and byproducts of</p>	Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the

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	<p>Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>these new chemicals. Reformate includes xylenes as well as other aromatic chemicals such as toluene, trimethylbenzene, and ethylbenzene, octane, and isopropylbenzene. The use, handling, transportation and disposal of these products and chemicals has not been properly analyzed in the DEIS. Tesoro bypasses analysis of impacts of these chemicals for, by way of example, indicating that any spills will be cleaned up “immediately,” before a spill would “reach bare ground” [DEIS 320] and that impacts to water in the event of a spill or contamination will not be significant because of their high volatility and due to the rapidity with which they vaporize into the air. This assessment is inadequate and fails to distinguish the different risks and harms of these different chemicals. The procedures for safely handling, transporting, using and disposing of each new chemical should be fully explained in the DEIS, along with the risks and potential impacts that could be caused by a leak or exposure to this chemical.</p> <p>Xylenes are toxic. Per the EPA, “Human and animal data show that all xylene isomers or xylene mixtures produce similar effects...[a]cute inhalation exposure to mixed xylenes in humans has been associated with dyspnea and irritation of the nose and throat; gastrointestinal effects such as nausea, vomiting, and gastric discomfort; mild transient eye irritation; and neurological effects such as impaired shortterm memory, impaired reaction time, performance decrements in numerical ability, and alterations in equilibrium and body balance.” [EPA Factsheet, Xylenes, 2016. Available online at: https://www.epa.gov/sites/production/files/201609/documents/xylenes.pdf . Last accessed May 3rd, 2017.] “Chronic exposure of humans to mixed xylenes, as seen in occupational settings, has resulted primarily in neurological effects such as headache, dizziness, fatigue, tremors, incoordination, anxiety, impaired short term memory, and inability to concentrate. Labored breathing, impaired pulmonary function, increased heart palpitation, severe chest pain, abnormal EKG, and possible effects on the kidneys have also been reported.” Id. “Besides occupational exposure, the principal pathway of human contact is via soil contamination from leaking underground storage tanks containing petroleum products. Xylene can leak into the soil, surface water or</p>	<p>refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>The different spill prevention measures for the various materials that would be used as part of the proposed project are detailed in Chapter 2 of the Draft EIS. Sulfolane spill prevention measures and behavior of sulfolane if spilled are discussed in Section 2.8.3.1 and 5.3.2.3 of the Draft EIS. Changes to the existing NPDES permit and the capacity of the existing WWTP are discussed in Section 5.3.2.2 of the Draft EIS. See Section 9.6.2.1 of the Draft EIS for further information on the toxicity of sulfolane.</p> <p>The ARU would be equipped with a sulfolane-specific OWS system designed to minimize the chance of sulfolane entering the refinery OWS. This special sewer system serves as an upstream wastewater pollution prevention technique consistent with Ecology’s NPDES Wastewater Discharge Permit Pollution Prevention goals. The following engineering controls would be included to manage sulfolane at the refinery:</p> <ul style="list-style-type: none"> • Closed drain system and sump to collect and recycle the sulfolane to the process. • Closed sewer system to collect stormwater that would be isolated and quality verified to check sulfolane concentration prior to releasing to the OWS system. • Secondary containment around the sulfolane storage tank and pumps that transfer sulfolane to the ARU process. • Sulfolane management practices and procedures, including recycling and treatment methodologies, would be developed prior to start-up operations as a component of the refinery’s process safety management program

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		<p>ground water where it may remain for months or more before it breaks down into other chemicals.” [Kandyala, Reena; Raghevendra, Sumanth Phani C.; and Rajasekharan, Saraswathi T., “Xylenes: An overview of its health hazards and preventive measures.” Article from the Journal of Oral and Maxillofacial Pathology, 2010 JanJun; 14(1): 1–5. Republished on the U.S. National Library of Medicine, National Institutes of Health, National Center for Biotechnology Information. U.S. National Library of Medicine https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996004/ . Last accessed May 3 rd , 2017.]</p> <p>In addition to xylenes, aqueous ammonia and sulfolane are two new chemicals planned for use at the plant for processing mixed xylenes. [DEIS 242] Ammonia is a corrosive substance with a strong odor; inhalation can result in irritation of the nose, throat, and lungs. [The Centers for Disease Control, Agency for Toxic Substances and Disease Registry (ATSDR), Public Health Statement for Ammonia, 2004. Available online at https://www.atsdr.cdc.gov/phs/phs.asp?id=9&tid=2 , last accessed May 2 nd , 2017.] Exposure to very high levels of ammonia may result in severe burns to the skin, eyes, throat, or lungs, which could cause permanent blindness, lung disease, or death; accidental consumption could result in burns in the mouth, throat, and stomach. Id. OSHA guidelines exist regarding exposure and handling of this chemical.</p>	<p>Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed xylene storage systems and pumping areas were designed to include secondary containment around all tanks so that any xylene that leaked would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery’s WWTP (see Section 2.8.5 of the Draft EIS). Leak detection systems for tanks and piping would alert workers in the event of a spill and there are spill measures in place to clean up spills. Refinery personnel are trained in spill prevention and response. If the secondary containment failed, the spilled material would be routed to the WWTP.</p> <p>Requirements for the safe handling, transportation, and storage of oils and hazardous substances are administered by the U.S. Coast Guard, Washington State Department of Ecology, and U.S. Environmental Protection Agency. Additional information regarding agencies responsible for the safe handling and storage of oils and hazardous substances is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The Draft EIS concluded that impacts could be potentially significant in the event of a worst case or maximum most probable spill in marine waters. Spills at the refinery were not considered potentially significant due to the controls, equipment,</p>

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			<p>and trained personnel at the refinery able to respond to a spill 24 hours a day.</p> <p>Human and animal exposure to xylenes or reformate can result in toxic effects if concentrations are sufficiently high, as described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 <p>The toxicity of xylene, reformate, aqueous ammonia, and sulfolane to humans is discussed in Section 9.6 of the Draft EIS. Additional information regarding xylene toxicity and exposure in humans is found in Section 3.6 of this Final EIS. Additional information on the toxicity of xylenes to animals is provided in Section 3.5.2 of this Final EIS.</p>
Ch09-228	Tesoro Anacortes Refinery, Rebecca Spurling	<p>Tesoro submits this letter, to assist Skagit County in clarifying the analysis of impacts from the CPUP, particularly in the following areas:</p> <ul style="list-style-type: none"> • The FEIS should analyze public health impacts using industrial hygiene standards, not regulatory standards for analyzing emissions from new and stationary sources. 	<p>An extended discussion on short- and long-term exposure to hazardous pollutants is provided in Section 3.6.2 of this Final EIS. Table 6 in this Final EIS illustrates different exposure limits including ASILs, USEPA AEGL-1, and WISHA PELs for the hazardous pollutants that would be emitted in the event of a spill.</p>
Ch09-229	Anonymous	<p>[Results form EPA Risk-Screening Environmental Indicators]</p> <p>So, you think Tesoro is concerned about public health? We are being lulled into sickness by the lure of tax dollars. Past behavior = future behavior, and under a gutted EPA. Let's find alternative companies to join our economic base!</p>	<p>Thank you for your comment.</p>
Ch09-230	Anne Winkes	<p>I am a retired pediatric nurse practitioner living in Conway. I worked in Skagit County for 33 plus years providing wellness care, and acute and chronic illness care for patients from birth to age 21 years. I continue to care deeply about the health of our communities.</p> <p>I believe that Tesoro's proposed Xylene project poses a significant</p>	<p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for worker and community health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding xylene as a potential human carcinogen,</p>

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		<p>threat to the health of the workers at the refinery, to those people who live, work and play in the areas surrounding the refinery, including Anacortes, La Conner, the Swinomish Reservation, and to those people who live, work and play along the BNSF RR tracks from the Bakken oil fields to the Tesoro Refinery.</p> <p>The DEIS mentions some of the adverse health impacts associated with the proposed xylene project, but fails to mention others at all and fails to analyze in depth the direct, indirect and cumulative adverse impacts of the project on human health.</p>	<p>short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS.</p> <p>Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of the Final EIS.</p>
Ch09-231	Barbara Tuttle	<p>I understand that the company is interested in producing xylene as a byproduct and shipping it. I have personal experience with working with xylene. As a printing press operator and serigrapher, I used xylene as a cleaning agent, so I know what a dangerous environmental and health hazard it is.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-232	Ruth Allen	<p>Xylene is a highly, flammable toxic petrochemical byproduct!! ... This proposed production of Xylene is a dangerous endeavor for our area!!!</p>	<p>The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Xylenes have a similar flammability to gasoline, already in production at the refinery (see Section 9.6.1 of the Draft EIS). Potential impacts of unplanned events (including spills, fires and explosions) are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial vegetation and wildlife from fire or explosion –

ID	Contact	Comment Text	Response
			<p>Section 6.4.3</p> <ul style="list-style-type: none"> Human health from fire or explosion – Section 9.6.1 <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 Vessel safety and waterway management – Section 13.4.1.2 Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-233	Hoa Pantastico	<p>We do not need a Xylene plant in Anacortes. Xylene is dangerous to public health and short-term exposure to xylene is known to cause difficulty breathing, impaired memory, and delayed response to visual stimulus, among other issues. At very high levels of short-term exposure, people have died! Long-term exposure can lead to depression, insomnia, tremors, and worse. Please do not allow this plant in our neighborhood.</p>	<p>The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding short-term versus long-term exposures of xylenes is provided in Section 3.6.2 of this Final EIS. Additional information regarding the agencies responsible for regulating community health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-234	Maureen Scheetz	<p>Xylene also produces health concerns because it is linked to brain tumors, cancer and birth defects.</p>	<p>Xylene is not classified as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene. In addition to these impacts, ethylbenzene may be carcinogenic in humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS.</p>

ID	Contact	Comment Text	Response
			<p>Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-235	Alexandra Gayek	<p>I am a physician with a specialty in environmental health. Any environmental health specialist is aware of the tendency in analysis to break down the impact of potentially hazardous substances so that taken by itself, a single or limited time exposure to a tiny amount cannot be demonstrated to cause adverse health effects. The reality of human life, as well as to the ecosystem, is that what matters is the CUMULATIVE AND SYNERGISTIC impact of tiny exposures to hundreds of thousands of substances over decades.</p>	<p>Human exposure to xylenes or reformatate can result in toxic effects if concentrations are sufficiently high (see Section 9.6.2.1 of the Draft EIS). The toxicity of xylenes and reformatate humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in Sections 9.3 and 9.6.2 of the Draft EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site (including xylenes), prevent releases, control worker exposures, and respond to spills and unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformatate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating air emissions and human health is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term</p>

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			<p>versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS.</p>
Ch09-236	Maggie Wilder	<p>I am totally opposed to having xylene traveling on our waterways. Having been in the trades during my career, I am very aware of its toxicity to all life. The risks to life are too high.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch09-237	Glen Bruels	<p>In addition to the “normal” risks to our population through inhalation of fumes, skin irritation and absorption associated with contact, and potential ingestion if the xylene found its way into the water table, we are living in one of the most pristine and environmentally sensitive areas in the country.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch09-238	Mary Heath	<p>Xylene Exposure</p> <p>More research and analysis should be brought forward to alleviate any possibility of potential health hazards to humans from xylene exposure.</p>	<p>Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to humans in Sections 9.3 and 9.6.2.</p> <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-239	Mary Manous	Xylene is dangerous to public health	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p>

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			<ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-240	Linda Talman	The increase in the scope of Tesoro projects should be denied. We did not have enough baseline data on current levels of pollutants and how they affect neighbors and the various compass directions from the refinery and cannot therefore know what the suggested	The impacts on human health associated with a xylene spill and subsequent evaporation to air are discussed in Section 9.6.2 of the Draft EIS. In general, the proposed project is not likely to produce xylene emissions. Xylene would be released to the air in

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		<p>increase will be. A 2.2% increase of all pollutants does not give us what we need to know. How much would the health affecting pollutants be increased.</p> <p>What would be the effect of the xylene related ones on our environment and on our health.</p> <p>Where is the data for the health effects?</p> <p>We also do not have the figures on how the cancer rates of the related communities compare to areas without refineries and how this would be changed by that amount of increase. Is a small increased the tipping point to lead to a large increase in health effects?</p>	<p>the event of a spill, followed by the evaporation of xylene to the air. Potential impacts on air quality and preventive measures to help control air emissions are discussed in the Draft EIS. The proposed project's emissions, comparison to health-based air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS.</p> <p>Additional information on short- and long-term exposure to hazardous pollutants is provided in Section 3.6.2 of this Final EIS. Table 6 of this Final EIS illustrates different exposure limits based on different exposed populations (general public and workers) for the hazardous pollutants that would be emitted in the event of a spill.</p> <p>Skagit County cancer incidence rates are discussed in Section 9.3.1.2 of the Draft EIS and the County rates were compared to Washington State as a whole. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the facility is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-241	Ed Gastellum	<p>What would be the increase in arsenic, and other heavy metals not monitored by the Department of Ecology which are even more toxic to human health? What increases in methane and benzene would there be?</p>	<p>Heavy metals were analyzed and emissions would not exceed health-based levels, see Table 4-10 in the Draft EIS. Emissions of heavy metals are considered potential toxic air pollutants and are regulated by Ecology. The proposed project would increase the natural gas (methane) usage at the facility. The natural gas would be supplied through the gas distribution system owned and operated by Cascade Natural Gas and such gas distribution is regulated for safety by Ecology.</p>
Ch09-242	Maureen Scheetz	<p>Health concerns should be studied more intensely.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2

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			<ul style="list-style-type: none"> Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-243	Barbara Tuttle	<p>It [the EIS] should emphasize worker safety, the impact on nearby communities and the environment and plans for detection and assessment of exposure to xylene. It seems short-sighted to think that a xylene leak or spill would not require mitigation beyond existing permits and procedures. The danger to workers and those of us who live in the area indicates that the EIS should consider the full impact of this project.</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> Terrestrial wildlife, including marine birds – Section 6.4.3.3 Marine species – Section 7.4.3.2 Human health (air emissions and spills) – Sections 9.3 and 9.6.2 Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the potential impact of xylenes on human health is provided in Section 3.6 of this Final EIS.</p> <p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past</p>

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			<p>incidents to identify lessons learned and update their safety practices accordingly. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-244	Colin O Hermans	I used to have to work with Xylene as part of my job. Xylene actually smells good, but it is nasty stuff. The present Tesoro facility is not the place to produce it.	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for</p>

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			human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.
Ch09-245	David Harrison	As a physician, I am concerned about the public health implications of this expansion.	Thank you for your comment.
Ch09-246	Barry LeBeau	This Chemical [xylene] is listed in 2015 Priority List of Hazardous Substances-#180;	Thank you for your comment.
Ch09-247	Teresa Mueller	More iffy chemical exposure for us? No thanks. Having seen cancers associated with industrial toxins up close has cured me of my curiosity and greed to make my state richer at the expense of our health and well being.	Thank you for your comment.
Ch09-248	Virgene Link-New	I AM HIGHLY ALLERGIC TO SULFUR, SULFATES AND SULFITES, AS ARE MANY OTHERS.	Thank you for your comment.
Ch09-249	Kathryn Trueblood	Xylene is used as a solvent in the printing, rubber, paint and leather industries, and it has been widely documented as harmful to humans and other creatures. The National Institutes of Health have plenty to say about it: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996004/	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is included in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch09-250	Carolyn Barney, Lyndon Greene	<p>First, Xylene is a toxic, flammable oil product. We both feel Tesoro has no business producing and exporting this dangerous material so very, very close to Anacortes and other nearby communities, for example, Guemes Island, Bow Edison, Samish Island, La Conner and the Snohomish Tribal Lands. What may be right for Tesoro investors and customers i.e., one more product to ship to the exploding Asian market may be a huge disaster for our local community. Why take this risk!</p>	<p>The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Xylenes have a similar flammability to gasoline, already in production at the refinery (see Section 9.6.1 of the Draft EIS). Potential impacts of unplanned events (including spills, fires and explosions) are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial vegetation and wildlife from fire or explosion – Section 6.4.3 • Human health from fire or explosion – Section 9.6.1 • The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS: • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-251	Joe Bucek	<p>The areas of my concern are:</p> <p>Xylene Exposure</p> <p>More research and analysis should be brought forward to alleviate any possibility of potential health hazards to humans from xylene</p>	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3

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		exposure.	<ul style="list-style-type: none"> • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-252	Livia Jackson	I implore you to stop what you are proposing that endangers our health and to carefully consider ideas below [from Form 10]. Many I know have already suffered cancers due to Xylene exposure- it is extremely toxic and carcinogenic. This is a threat to every living thing. Please consider the health and welfare of the ecosystems our lives depend on... and I	Xylene is not classified as a carcinogen by the USEPA (see Section 9.6.2.1 of the Draft EIS). Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high. Ethylbenzene has similar short-term health impacts as xylene In addition to these impacts, ethylbenzene may be carcinogenic to humans. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding the potential for xylenes to cause cancer in humans is provided in Section 3.6.1 of this Final EIS.
Ch09-253	Nancy Carey	Please consider the potential hazards to our health and to the surrounding areas.	<p>Human exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to humans in the following sections:</p> <ul style="list-style-type: none"> Human health (air emissions and spills) – Sections 9.3 and 9.6.2 Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p>
Ch09-254	Teresa Mcqueen	Personally, to still be creating, transporting and using chemicals such as this is unethical to supporting life on this planet. It ruins our economy due to the escalating number of people disabled and	Thank you for your comment.

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		chronically ill from the vast and not only unnecessary, but damaging use of chemicals in the way we live today. It should not be made, period.	
Ch09-255	Vicki Thomas	According to the Sightline Institute humans and animals exposed to the xylene face serious health threats. Short term exposure to very high concentrations of xylene, such as would be the case during a spill, result in death. Long term exposure can lead to harmful effects on the liver, kidneys, lungs, heart and nervous system.	<p>Human and animal exposure to xylenes or reformato can result in toxic effects if concentrations are sufficiently high (see Section 9.6.2.1 of the Draft EIS). The toxicity of xylenes and reformato to animals and humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. The toxicity of xylene (and reformato) to animals and humans is discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>The refinery has systems in place designed to properly handle the chemicals on site (including xylenes), prevent releases, control worker exposures, and respond to incidents. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformato into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating air emissions and human health is provided in Table 2</p>

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			in Section 3.1 of this Final EIS. Additional information regarding the potential for xylenes to cause cancer in humans, short-term versus long-term exposure in the event of a spill, and safety considerations is provided in Section 3.6 of this Final EIS.
Ch09-256	Tom Cole	Ignoring human health costs is another way of ignoring environmental damage. Tesoro must account for this;	Thank you for your comment.
Ch09-257	Signature illegible, Gretchen Allison, Pam Coffey, Liza Michaelson, Lisa Nash Lawrence, Eric Ray, Daniel Tucker, Shann Westa	NO XYLENE NO XYLENE - IT HAS A SENDING AGENT- THAT PENETRATES - THE - SKIN of ANYTHING	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-258	Izzi Lavallee	This [toxins in the environment being passed on to offspring] is not only a problem for orcas, but for all mothers who rely on the food sources of the salish sea. We must ensure the survival of our children and the children on more vulnerable populations.	Thank you for your comment.
Ch09-259	Sloane Winkes	As a physician, I am extremely concerned about the potential health effects of Xylene on refinery workers, community members, and our environment at large in the event of a spill. The health effects have not yet been adequately studied by the DEIS. The final EIS must assess the effects of acute and chronic exposure of xylene	<p>Human and animal exposure to xylenes can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. The Draft EIS analyzed the toxicity of xylene (and reformate) to animals and humans in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3

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		<p>on women of reproductive age, children, and workers. The EIS must report on the potential impacts on pregnant women and fetuses in particular. Additionally, the EIS must evaluate the acute and chronic effects on people with chronic health conditions such as asthma, cancer, cardiovascular, and neurological diseases.</p>	<ul style="list-style-type: none"> • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5 <p>Additional information regarding the toxicity of xylene and reformate to birds and aquatic species in the marine environment is provided in Section 3.5.2 of this Final EIS. Additional information regarding the toxicity of xylenes and the carcinogenic potential of xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for human health, safety at the refinery, and safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-260	Luba Pekisheva	<p>The chemical that is of most concern to me is Xylene. It would be disastrous to the health of the already crowded and narrow passages of the Salish Sea, not to mention the workers who make it.</p>	<p>Human exposure to xylenes or reformate can result in toxic effects if concentrations are sufficiently high (see Section 9.6.2.1 of the Draft EIS). Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft</p>

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			<p>EIS). The toxicity of xylenes and reformate to humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. The potential impacts to vessel traffic and safety if a spill were to occur along the marine vessel transportation route are discussed in Sections 13.3.2.3 and 13.4.2.3. Impacts from a marine spill on human health are discussed in Section 9.6.2 of the Draft EIS.</p> <p>Worker health and safety is managed in accordance with WISHA of 1973 enforced by the Washington State Department of Labor and Industries, DOSH. DOSH periodically inspects the facility to confirm that Tesoro is in compliance with applicable regulations and permit conditions.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for regulating safety practices and human health at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-261	Sue O'Donnell	And why is it OK for us to ship this stuff to lands where other innocent people, children & pets live?????	Thank you for your comment.

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Ch09-262	Mary Brady	I am concerned about the potential health hazards of xylene.	<p>Human and animal exposure to xylenes or reformat can result in toxic effects if concentrations are sufficiently high, as the Draft EIS describes. Xylene production and storage systems at the refinery would have vapor control systems that would be regularly maintained and inspected (see Chapter 2 of the Draft EIS). The toxicity of xylenes and reformat to animals and humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. The toxicity of xylene (and reformat) to animals and humans is discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Section 13.5
Ch09-263	Gae Weber	<p>As you continue the environmental review, please ensure that the Final EIS:</p> <p>...</p> <p>Documents the increased NOISE POLLUTION that will occur if the expansion is allowed, publishes the data and allows for a period of public comment. Requires all possible noise abatement methods and technologies be implemented, with language mandating the adoption of improved methods and technologies as they emerge.</p>	This topic is discussed in Section 9.5 of the Draft EIS.
Ch09-264	Sheila Ryan	The state plans the roundabout construction during the same time frame you plan to unload & haul truckloads. Please think about those people who will be traveling off island from Whidbey. We only have 2 ways off the island & using the sharpest corner is a necessary evil to get to Burlington or anywhere off the island if we don't take the ferry. Don't add to our problems.	<p>The proposed project is planned to be completed between 2017 and 2018, pending SEPA review and permitting. Construction is anticipated to take approximately 19 months to complete with peak construction expected to last 3 to 4 months in the middle of this period (see Section 2.7 of the Draft EIS). Potential traffic impacts as a result of the proposed project's construction are described in Section 9.4.2 of the Draft EIS.</p> <p>The WSDOT SR 20 Sharpes Corner roundabout project is currently estimated to begin construction in the summer of 2018 and last through the fall of 2019 (see the project website at:</p>

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			https://www.wsdot.wa.gov/projects/sr20/sharpescornerinterchange/ .
Ch09-265	Annabelle Fox	<p>The disturbance to our way of life here during construction is unacceptable. Additional truck traffic on Highway 20 and March Point, at the same time the State of Washington Sharpes Corner roundabout project is constructed, will make traffic congestion a nightmare. There will be 133,000 cubic yards of fill material trucked in by 70 trucks hauling fill for four months for multiple sites. That calculates to approximately 8,800 truckloads of fill. In addition, 165,000 cubic yards of on-site [unintelligible] material will be used. Pier 2 in town will be used for vessel unloading and movement of all the oversight materials through Anacortes and out to the refinery by super-sized transport is a burden to our city. Who pays the toll this takes of the additional stress on our community while they construct 195-foot stretchers, boilers, storage tanks, reactors, elevated carbon distribution centers, towers, coolers, and more?</p>	<p>The Draft EIS analyzed potential impacts from increases in road traffic, during construction, on road traffic safety, land use, and recreation. The evaluation of road traffic impacts covered all routes used by proposed project traffic, including SR 20 and March Point Road. The potential impacts and control measures to address road traffic are outlined in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Impacts on Traffic Safety from Construction – Section 9.4.2.1 • Impacts on Land Use and Shoreline Use from Construction – Section 10.3.2.1 • Impacts on Recreation from Construction – Section 10.4.2.1 <p>The proposed project is planned to be completed between 2017 and 2018, pending SEPA review and permitting. Construction is anticipated to take approximately 19 months to complete with peak construction expected to last 3 to 4 months in the middle of this period (see Section 2.7 of the Draft EIS). Potential traffic impacts as a result of construction of the proposed project are described in Section 9.4.2 of the Draft EIS.</p> <p>The WSDOT SR 20 Sharpes Corner roundabout project is currently estimated to begin construction in the summer of 2018 and last through the fall of 2019 (see the project website at: https://www.wsdot.wa.gov/projects/sr20/sharpescornerinterchange/).</p>
Ch09-266	Evergreen Islands	<p>What are the potential impacts from plant construction and operation on local vehicular traffic and safety and transportation in general?</p>	<p>Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.</p>
Ch09-267	Carol O'Hearn	<p>Please site-visit March Point Road to become aware of the pending impact the construction of the Xylene Plant will have on this narrow two-lane road with limited shoulders.</p> <p>March Point Road in many places has very little, if any shoulder.</p>	<p>The proposed project is planned to be completed between 2017 and 2018, pending SEPA review and permitting. Construction is anticipated to take approximately 19 months to complete with peak construction expected to last 3 to 4 months in the middle of this period (see Section 2.7 of the Draft EIS). Daily material</p>

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		<p>The road is heavily patched in places.</p> <p>There are "No Shoulder" signs with a 50-foot plunge to the bay. There are areas of no shoulder with crumbling pavement and a plunge over a rocky cliff face. In several locations, the pavement is eroded to the fog line; again, there are steep, abrupt drops to the bay.</p> <p>No improvements are planned for East March Point Road. There are no plans to close it to traffic.</p> <p>Overflow traffic could use it.</p> <p>Tesoro is currently using the east side of its property. And there are no guarantees that overflow traffic won't be directed down East March Point Road. Tesoro will do it, if officials feel it is necessary. To that end, both East and West March Point Road need significant upgrading, beyond providing 11' clearance around a large boulder." The EIS concedes the shoulder in this area needs "to be improved to support vehicle loads." The entire road infrastructure needs to be upgraded and improved to support vehicle loads as this is a disaster in the making. Does the county want to be complicit in this disaster?</p> <p>ES5.3.1 Construction Activities Increased vehicle traffic due to the presence of additional workers and delivery of site materials. 10-50 truck trips per day on SR20 and March Point Road Delivery of process units from the Port of Anacortes-52 deliveries. The largest module for these transports will be 30 feet wide, 30 feet high, 100 feet long and weigh up to 250,000 pounds. Transportation of the 52 oversized pieces of equipment would be via the Port of Anacortes site to Tesoro, West March Point Road and North Texas Road to Gate 10 entrance around the large boulder. Multiple SPMTs may be aligned into a train for the move to the refinery. Import of fill material required for the New Tanks area-70 trucks per day for 4 months. That is at least 2,100 trips.</p> <p>ES2.7.4 Typical materials required for site civil work such as structural fill, sand, gravel, crushed stone, rebar, concrete and structural steel would also be delivered by</p>	<p>deliveries during construction, operations, and maintenance are anticipated along local designated truck routes, primarily SR 20 and West March Point Road. Oversized pieces of equipment would be delivered via the Port of Anacortes site to Tesoro along portions of SR 20, West March Point Road, and North Texas Road to the refinery. Planned improvements along North Texas Road are discussed in Section 2.7.1.7 of the Draft EIS and construction vehicle traffic is discussed in Sections 2.3 and 2.7.4 of the Draft EIS. Potential traffic impacts as a result of construction of the proposed project are described in Section 9.4.2 of the Draft EIS.</p> <p>Transport permits would be required from the city of Anacortes and Skagit County and a Superload Transport Permit would be required from the WSDOT for the SPMT heavy haul moves from the Port of Anacortes to the refinery. WSDOT is responsible for regulating the safety of Superload Transport vehicles and would issue a permit for the portion of the route that encompasses state roads (SR 20). The city of Anacortes is responsible for regulating Superload transport within city limits. Skagit County is responsible for regulating the safety of the Superload transport on County roads, including March Point Road. The County also regulates heavy haul transport of fill to the refinery during construction activities for the proposed project (see Section 9.4.2.1 of the Draft EIS). The proposed project does not include the use of East March Point Road as a heavy haul route. Potential environmental impacts associated with heavy haul transport along East March Point Road were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>truck.</p> <ol style="list-style-type: none"> 1. Approximately 133,000 cubic yards of fill would be imported resulting in additional truck trips along SR20. 2. During the 20-month construction, vehicle trips to the refinery would increase due to trips generated by construction employees of approximately 190 round trips per day. That is at least 114,000 trips. <p>ES2.8.1 Vehicle Traffic • If the project is approved, truck traffic would increase over current levels to deliver commodity chemicals, generating 50 truck trips per year. Trucks would carry sulfolane, aqueous ammonia and perchloroethylene.</p> <p>After the project, the road infrastructure will have to undergo upgrading and improvement to repair any and all damage related to the construction process. In addition, the road will have to be maintained on a regular basis, due to increased traffic. There are no plans in the EIS to do regular maintenance and repair on the road after the project is complete.</p> <p>Please consider these points in your deliberation of the Xylene Plant.</p>	
Ch09-268	Sandra Kraus	<p>The refinery has a less than stellar record with safety and worker protocols and it actually sounds as if the inspections will be self-monitored?!</p>	<p>The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Potential impacts of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents –

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			<p>Appendix 2-A</p> <p>Tesoro does perform its own inspections, and is subject to outside regulatory verification that the appropriate safety regulations are being followed. Self-monitoring and reporting is standard operating practice. Worker health and safety is managed in accordance with WISHA of 1973 enforced by the Washington State Department of Labor and Industries, DOSH. DOSH periodically inspects the facility to confirm that Tesoro is in compliance with applicable regulations and permit conditions. Additional information regarding the agencies responsible for regulating community health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-269	Gayle Janzen	<p>And please take into consideration Tesoro’s checkered safety record including persistent problems at the Golden Eagle Refinery in California (which would supply some of the reformate for xylene production), a deadly fire at the Anacortes Refinery, and a troubling pattern of withholding information from the public and regulators. They don’t exactly sound trustworthy!</p>	<p>The Draft EIS discusses the proposed project at the Anacortes refinery. The Anacortes refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Potential impacts of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Ch09-270	Maradel Gale	<p>In addition, [xylene] is a toxic chemical, which creates dangers for</p>	<p>Xylenes can be toxic to humans if exposed to sufficiently high</p>

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		not only people working with and around it...	<p>concentrations (see Section 9.6.2.1 of the Draft EIS). The refinery's safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Worker health and safety is managed in accordance with WISHA of 1973 enforced by the Washington State Department of Labor and Industries, DOSH. DOSH periodically inspects the facility to confirm that Tesoro is in compliance with applicable regulations and permit conditions. Additional information regarding environmental health is provided in Section 3.6 of this Final EIS. Additional information regarding agencies responsible for regulating safety practices and human health at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-271	Alberta Finley	<p>The hazards of xylene are well documented:</p> <p>...</p> <p>Dangerous to the workers producing it</p>	<p>Xylenes can be toxic to humans if exposed to sufficiently high concentrations. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS.</p> <p>Worker health and safety is managed in accordance with WISHA of 1973 enforced by the Washington State Department of Labor and Industries, DOSH. DOSH periodically inspects the facility to confirm that Tesoro is in compliance with applicable regulations and permit conditions.</p> <p>The refinery's safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Tesoro would be required to make the</p>

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			<p>proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect human health. These regulations and operations plans are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding environmental health is provided in Section 3.6 of this Final EIS. Additional information regarding agencies responsible for regulating safety practices and human health at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-272	John Janson	<p>your plant is producing some necessary product that just so happens to be the most toxic, hazardous, with potential for catastrophic consequences when things "go terribly wrong" as evidenced by events such as the tragic explosion and resulting deaths at the plant in 2010. this occurred in the presence of all of the same well intentions and precautions and best efforts and the very same measure of acceptable risk that are mentioned in the EIS. sure, risks are small until something like that happens, and the results are unforgiveable, permanent and horribly tragic to all involved. your proposed 60 yearly tankersfull of this dangerous chemical only compounds and increases the possibility of something similar happening that is irreversible and far reaching in its subtle and overt consequences.</p>	<p>Xylenes can be toxic to humans if exposed to sufficiently high concentrations. The toxicity of xylene (and reformate) to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding environmental health is provided in Section 3.6 of this Final EIS. The refinery has systems in place to properly handle chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Potential impacts from unplanned events, including fires,

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			<p>explosions, and spills – Section 9.6</p> <ul style="list-style-type: none"> • Coordination and training of Tesoro and local emergency service providers – Section 11.4 <p>Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A</p>
Ch09-273	Wendy Courtemanche	<p>Lastly, I ask that Tesoro is held to the highest safety standards in the protection of its refinery workers and in its production and transport of xylene.</p>	<p>The refinery’s safety measures and procedures that are in place and would be implemented as part of the proposed project are discussed in the Draft EIS. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-274	Town of La Conner	<p>Resolution No. 531</p> <p>A RESOLUTION PROVIDING COMMENTS TO THE TESORO EIS</p> <p>Whereas, the Town of La Conner is connected to the work of the Tesoro refinery. Our community includes many who work at the valley refineries as well as those who support the work there in</p>	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of</p>

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		<p>some capacity; and,</p> <p>Whereas, the health and safety of our community members is a high priority; and,</p> <p>Whereas, La Conner's proximity to the refinery leaves the Town vulnerable to the environmental impacts of the proposed project; and,</p> <p>Whereas, the Draft Environmental Impact Statement (DEIS) should establish high standards of care in monitoring and addressing risks of exposure to xylene for their workers as well as with managing risks in the event of community and environmental exposure with a tanker spill incident or an accident with air release of xylene; and,</p> <p>Whereas, the new xylene processing facility and the transportation issues relating material supply and product transport have separate unrelated impacts.</p> <p>NOW, THEREFORE BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF LA CONNER REQUESTS THE FOLLOWING COMMENTS BE ENTERED INTO THE DEIS RECORD: ...</p> <p>Section 2: Expand and Emphasize Worker Safety- An emphasis should be placed on detection and assessment of worker exposure to xylene to prevent short-term and long-term health risks.</p>	<p>regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular practice drills. Additional information on emergency response coordination between the refinery and the local communities is provided in Section 3.7.1 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for safety at the refinery and for safety in marine waters is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-275	Anne Winkes	<p>I'm a retired pediatric nurse practitioner. I'm here because I care deeply about the health of our communities. Tesoro's proposed xylene project poses a significant health and safety threat to refinery workers. The DEIS mentioned some of the adverse health impacts associated with xylene exposure and assures us that workers are well trained and equipped to handle any xylene-associated accidents. The DEIS does not otherwise analyze the</p>	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the</p>

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		<p>direct/indirect cumulative adverse health impact of xylene exposure. The FEIS must analyze the immediate and long-term, direct/indirect, and cumulative adverse health impacts of xylene exposure on refinery workers following both single incident, accidental xylene exposures, and daily work exposures that cannot be avoided. This analysis must include previous healthy individuals and individuals with prior chronic health conditions. It must include women of reproductive age, pregnant women, and children exposed to xylene in utero. The FEIS must analyze how Tesoro will monitor and keep records on the health of employees working with xylene and how effective such monitoring and record-keeping will be in targeting the hazards affecting workers and in identifying xylene-associated abnormalities. It must analyze what Tesoro will do if a worker has been harmed by xylene. It must analyze direct and indirect and cumulative economic impacts on the families of xylene-affected workers. Using the Chemical Safety and Hazard Investigation Board's findings, the FEIS must assure adequate safeguards to protect workers from xylene and its production.</p>	<p>workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>An extended discussion on short- and long-term exposure to hazardous pollutants is provided in Section 3.6.2 of this Final EIS. Table 6 of this Final EIS illustrates different exposure limits based on different exposed populations (general public and workers) for the hazardous pollutants that would be emitted in the event of a spill.</p>
Ch09-276	Marylee Chamberlain	<p>I think that I really want to leave a couple of concerns right here and some urgency there, as far as consideration for this Draft Environmental Impact Statement. I know there are a lot of potential risks involved in this project, in terms of the environment and human health. I'm most concerned about the workers, actually, at this plant</p>	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.</p>

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			<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and unplanned events. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4
Ch09-277	Marylee Chamberlain	As far as the workers' safety, there is a piece of this -- it looks at management of the process. And consideration of those findings of the chemical board -- Chemical Safety and Hazard Board, after the 2010 incident, need specific review so that all of those pieces are addressed.	<p>The refinery has systems in place designed to properly handle the chemicals on site (including xylenes), prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p>
Ch09-278	Sue O'Donnell	Very earnest employees of Tesoro testified about their safety training. There is most likely a cumulative impact when refining is ramped up. Do these employees get regular health checks as well as excellent training? Are rates of cancer higher in areas where crude oil is brought out of the ground and shipped (by rail, tankers, etc.) to once pristine places like the Salish Sea?	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program (covering training) in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in</p>

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			<p>accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <p>Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A Vessel safety and waterway management – Section 13.4.1.2 Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 Coordination and training between Tesoro and local emergency service providers – Section 11.4 With regard to cancer rates, the Draft EIS discusses Skagit County cancer incidence rates in Section 9.3.1.2.</p>
Ch09-279	Ruth Holder, Phillip Holder	<p>Worker Health Impacts Analysis Was Omitted:</p> <p>Although the DEIS briefly discusses the catastrophic 2010 Tesoro incident in Chapter 9, Environmental Health, and cites the CSB Report as a reference, it does not fully analyze this Report. Nor does the DEIS analyze the risks and consequences of all types of incidents including explosions, fires, spills, leaks, upsets, and releases of combustion products and toxic air contaminants into</p>	<p>Workplace safety requirements are managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. The refinery is required to comply with those regulations independent of the EIS or other regulatory permitting processes. The changes in refinery operations are not substantially different from current refinery operations with regards to handling of flammable materials, training about and protection from hazardous materials, and use of personal</p>

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		<p>the air that would result in probable significant adverse impacts to refinery employees and contractors. 4 [Refinery worker safety is not discussed in either the DEIS Summary (except for a brief statement “If a spill were to occur on the refinery property, on-site workers could be at risk of health impacts” and reference to Section ES7.11) or Impact Criteria Tables, Appendix –B .] The DEIS reaches a questionable conclusion that: “[c]onsidering the controls that are now in place and the lack of a significant change in the presence of flammable materials at the refinery, impacts on public health as a result of a fire during construction or operation of the proposed project would be less than significant.” §9.6.1 (Emphasis –unbolded italics –added.) First, this conclusion only addresses “fire.” WAC 197-11-444(2)(ii) specifically requires “risks of explosions” to be addressed in an EIS. DEIS § 9.2.2, Methodology, promises that fire and explosion impacts would be addressed, §9.6, Unplanned Events, lists explosions, §9.6.1 cites potential for explosions and the inset box on p. 9-28 is labeled “Heat Exchanger Explosion” yet there is no analysis of “explosions” or conclusion as to significance. The fire following the 2010 explosion at Tesoro burned for 3 hours making it questionable that Tesoro’s “own trained 24-hour fire response brigade ... would immediately address any fires at the facility.” p. 9-28. The DEIS does not explain what “address” means here.</p> <p>Additionally, reliance on “no significant change in the presence of flammable materials at the refinery” (emphasis added) is text that appears designed to obscure rather than reveal. The DEIS states that the proposed project requires the operation of new and expanded units at the refinery as well as the use of new and additional amount of materials, including highly hazardous materials. The DEIS describes the following new and expanded units needed for the project: naphtha hydrotreater unit (NHT), Isomerization (Isom) Unit, aromatics recovery unit (ARU), steam boiler, Marine Vapor Emission Control (MVEC) System (consisting of a dock safety unit and an on-land vapor combustion unit) , and three storage tanks in the New Tanks Area. DEIS §2.8 says “[o]peration would increase the use of materials handled at the refinery, and would introduce new materials to be used in the ARU and boiler.” New materials that would be used for the project are</p>	<p>protective equipment for hazardous tasks. Tesoro is required by DOSH to protect their workers from workplace hazards and update safety programs as needed to cover all operations.</p> <p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Explosions are discussed in Chapter 9 of the Draft EIS, with more than a dozen references to explosions in that chapter.</p> <p>The Draft EIS’s use of “immediately address” refers to the response to a fire. The time to contain and extinguish a fire would depend on the fire. In the case of the 2010 explosion, extinguishment took 3 hours as the Draft EIS notes.</p> <p>Xylenes and reformat are flammable and have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS). Gasoline is a category 2 flammable material under the federal OSHA regulations, while xylenes are a category 3 (slightly less flammable). Actions taken in response to a xylenes or reformat fire would be the same as responding to a gasoline fire. Issues of static charge, floating on water, confined space hazard, etc. would be a concern for gasoline or xylenes. Therefore, the refinery’s existing fire prevention and responses measures would be expanded to include the xylenes operation, but the proposed project does not represent a new or different set of requirements for the refinery.</p> <p>Benzene is not a component of either the reformat mix or the mixed xylenes that would be shipped on vessels (see Table 2-1 of the Draft EIS). The human toxicity of xylene, hazardous components of the reformat mix, aqueous ammonia, sulfolane, and perchloroethylene is discussed in Section 9.6.2.1 of the Draft EIS.</p>

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		<p>sulfolene and aqueous ammonia. The project would significantly increase the amount of natural gas, reformate and perchloroethylene.</p> <p>The receipt of new and vastly increased materials including reformate, processing using new and expanded units to produce 15,000 barrels of mixed xylenes per day, and marine loading of xylene for purposes of marketing it as a product is both qualitatively and quantitatively different from types of amounts of materials and products now present at the refinery. Xylene is not just a “3” on the National Fire Protection Association Chart, but like reformate it can accumulate static charge. Xylene can also result in distant ignition and flashback , can float on water and spread fire, can result in a fire or explosion when heated and is a confined space hazard. The planned project would transform the refinery into a petrochemical plant processing large amounts of hazardous chemicals. Yet the DEIS unacceptably treats the xylene project as if it is an inconsequential increase in business as usual.</p> <p>Compounding the problem with this section, the DEIS applies a shifting , opaque use of “public health” so that refinery workers and contractors have been removed from a thorough impacts analysis (for example, “... it is considered unlikely that a fire would become established in the proposed project area or spread beyond the refinery in a manner that could impact the public.”). P. 9-29. Leaving refinery and contractor employees out of the impacts analysis is also a feature of the conclusion for spill response for spills resulting in fires. P. 9-29. (Note: there is no analysis for leaks or other unplanned events that could cause fires and explosions.) The DEIS reaches the conclusion that impacts of unplanned incidents on public health would be less than significant while at the same time stating “[t]he 2010 heat exchanger explosion at the refinery did not extend beyond the refinery bounds, although there were very serious impacts within the refinery.” (Emphasis added.) P. 9-29. This contradiction further illustrates the unacceptable failure to include impacts on refinery and contract workers for the purpose of reaching the “less than significant” finding. Problems with the conclusion’s phrase: “c]onsidering the controls that are now in place” (Emphasis added)</p>	<p>DOSH is responsible for ensuring Tesoro workers are not exposed to air contaminants at concentrations greater than worker PELs for both acute and chronic exposures and that Tesoro takes all required steps to inform workers of the potential hazards of chemical exposure and provides appropriate training and personal protective equipment to prevent exposures. Therefore, health impacts to workers were assessed considering the existing regulatory requirements (e.g., air concentrations less than the PELs). For the general public in the event of a large volume marine spill (worst case or most probable maximum spill volumes analyzed in the Draft EIS), concentrations could be high enough to be a health concern; however, prolonged exposure during a spill event would not occur because of the rapid breakdown of the chemicals into harmless components.</p> <p>With regards to long-term emissions to air or discharges to water, Tesoro is required by Ecology and the NWCAA, as regulated under permits, to make sure their emissions/releases meet health requirements. These permits and their requirements are discussed in Chapter 4 and Chapter 5 of the Draft EIS for air quality and water quality, respectively. Additional information regarding agencies responsible for regulating air quality and water quality is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Potential impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. The proposed project’s emissions and potential mitigation are further discussed in Section 3.3 of this Final EIS. Additional information regarding agencies responsible for emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>will be discussed in detail below.</p> <p>The DEIS inadequately addressed direct, indirect and cumulative health impacts to refinery workers from exposure to increased amounts of reformat (containing toluene, benzene, trimethylbenzene, ethylbenzene, isopropylbenzene and xylene isomers), xylene, ethylbenzenes, and perchloroethylene and new process chemicals aqueous ammonia and sulfolene that would be used for the production of mixed xylenes. The FEIS must address direct, indirect and cumulative impacts to refinery workers from both chronic and acute exposure to each of these chemicals. Acute and chronic exposure to xylenes is well known to result in impacts to the nervous system, eyes, nose, throat, lungs, liver and kidney, gastrointestinal tract, skin, and reproductive system (may also harm unborn child). As the DEIS states: "Inhalation of xylene-related vapor can cause respiratory irritation, headaches, dizziness, difficulty breathing, and even death if the concentrations are sufficiently high." §9.6.2.1 Reformate as well as mixed xylenes contain ethylbenzene which, according to the DEIS §9.6.2.1, has the same health impacts as xylenes plus may be carcinogenic to humans. The xylene project will result in an increase in reformate and yield mixed xylenes in a pure form (these are currently not present at the facility). The DEIS states that mixed xylenes production requires an increase in the use of perchloroethylene that has short-term impacts and may be carcinogenic (bladder cancer and lymphoma).</p> <p>The DEIS acknowledges that "exposure to hazardous chemicals can result in both acute and chronic health impacts, depending on the substance type, exposure dose, duration, and frequency." The only worker health impact discussed is exposure during a spill event (DEIS inappropriately contains no analysis for leaks or upsets) in which inhalation occurs. §9.6.2.3. Even in that section, the DEIS attempts to brush the significance of impacts away saying workers would leave the area to an upwind location, a rapid response crew would contain the spill, and that the xylene emitted into the air would dissipate naturally in 24 hours. Beyond that, the DEIS states that "[m]ultiple layers of spill prevention and response measures are currently in place at the refinery, and would continue to be</p>	<p>The Draft EIS does conclude that there is a potentially significant health impact in the event of a large volume marine spill. The regulatory requirements for spill prevention, and the plans and programs in place for both prevention and response, are discussed in the Draft EIS in Sections 2.7.6, 2.8.5, and 13.5.</p>

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		<p>implemented during future operation of the proposed project.” It states “[s]pills would be prevented by constructing facilities in accordance with relevant standards” but does not identify and discuss the “relevant standards” and whether they are mandatory and enforceable. For conclusions about the unlikelihood of chronic health impacts from spills, the DEIS considers only spills “lasting for a short duration” and without further explanation, concludes that “prolonged human exposure is not expected.” The discussion about impacts from exposure to these chemicals is not comprehensive enough to support any reasonable conclusion about worker health impacts from chronic, acute, and/or cumulative exposure to these materials.</p> <p>WAC 197-11-444(2)(iii) requires the analysis of “releases or potential releases to the environment affecting public health, such as toxic or hazardous materials” not just analysis of “spills.” Omitting a thorough discussion of direct, indirect and cumulative impacts for refinery and contract employees from catastrophic incidents and exposure to increased volumes of hazardous chemicals (for all types of unplanned events including: explosions, fires, spills, leaks, upsets, and other releases of combustion products and toxic air pollutants into the air) leads to the groundless proclamation in EIS Summary ES7.7 for Chapter 9: “[n]o unavoidable significant adverse health impacts were identified.” Declining to identify them does not negate their existence. These glaring flaws in the DEIS deprives decision makers and the public of a clear understanding about probable significant adverse health impacts to workers and deprives decision makers of the opportunity to play a significant role in ensuring workplace safety at Tesoro. The Final EIS must not only analyze impacts to workers from all types of unplanned events, but also answer the question: what specific, effective, mandatory, and enforceable procedures and programs would be in place over the life of the project to reduce and prevent risks rather than responding to unplanned incidents after the fact?</p>	
Ch09-280	Mike Culley	I've been [unintelligible] Anacortes since 2003. I'm quite proud of the site I work at due to tremendous, positive attitude shown between Tesoro and its contractors. We truly depend on one	Thank you for your comment.

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		<p>another to get our jobs done safely every day and go home to our families at the end of the shift. Respect is mutual across the board. Such a statement cannot be said in some of the refineries in the region. I've worked at each of them, in this northwest corner of the state and also a few out of state. Tesoro stands alone as the golden ticket in this industry. But doing this job of supplying fuel to the homes, cars, ships, and planes in the area -- it might not look like the pinnacle of the industry, but it truly is. [Unintelligible] and industrial site miss the pristine environment.</p>	
Ch09-281	Whitney Gonzalez	<p>These are people [employed by the project] that are going to continue working in this refinery and a means of producing a product that is produced in a safe-like manner. And so, I mean, with that, it's -- it's -- I hear both sides. And it's something that's important to all of us, and that's -- I just want to make sure that you are all aware of the training that's involved at the refinery themselves.</p>	Thank you for your comment.
Ch09-282	Galen Herz	<p>Further, I would like to see that refinery workers follow the highest safety standards and are protected from the risks of toxic xylene spills.</p>	Thank you for your comment.
Ch09-283	Ronna Loerch	<p>The EIS should include language that address:</p> <ol style="list-style-type: none"> 1. The safety of refinery workers. This process will further endanger worker safety. 	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil

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			<p>spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-284	Phyllis Dolph	<p>Skagit County should include language in the final EIS that: ...</p> <p>Ensures refinery workers follow the highest safety standards and are protected from the risks of toxic xylene spills.</p>	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p>
Ch09-285	Sandy Robson	<p>Ensure refinery workers follow the highest safety standards and are protected from the risks of toxic xylene spills</p>	<p>Workplace safety requirements are managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. The refinery is required to comply with those regulations independent of the EIS or other regulatory permitting processes. The changes in refinery operations are not substantially different from current refinery operations with regards to handling of flammable materials, training about and protection from hazardous materials, and use of personal</p>

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			<p>protective equipment for hazardous tasks.</p> <p>The refinery’s measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-286	Washington Physicians for Social Responsibility, Bruce Amundson, Emily Peterson, Laura Skelton	<p>Worker Safety: Following the 2010 disaster that killed seven refinery workers at the Tesoro Anacortes Refinery, the US Chemical Safety and Hazard Investigation Board (CSB) made findings and recommendations concerning process safety management. The CSB found several indications of process safety culture deficiencies at the site. Refinery management had normalized the occurrences of hazardous conditions; the refinery process safety culture required proof of danger rather than proof of effective safety implementation; and it was recommended that the refinery implement a process safety culture program that will “assess and continually improve any identified process safety culture issues at the Tesoro Anacortes Refinery.” The DEIS concludes: “Considering the controls that are now in place and the lack of a significant change in the presence of flammable materials at the refinery, impacts on public health as a result of a fire during construction or operation of the proposed project would be less than significant.” However, the Chemical Safety and Hazard Investigation Board’s investigation was not referenced. The final EIS should fully examine the Chemical Safety and Hazard Investigation Board’s recommendations and ensure that these recommendations will be facilitated throughout this upgrade.</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p>
Ch09-287	Liz Lovelett	<p>As a councilmember in beautiful Anacortes, I have constituents continually bring me their concerns- both for and against- this project and I hope you will keep in mind that this letter represents</p>	<p>Thank you for your comment.</p>

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		<p>the voices of many. First and foremost, it is your duty to make sure all plans meet the highest and most rigorous standards for workplace health and safety. The employees at our refineries pay the ultimate cost when safety and environmental standards are not upheld to the highest level. It is unconscionable that they should suffer workplace environmental toxicity that can affect their health and well-being.</p>	
Ch09-288	Anne Winkes	<p>Adverse health impacts on refinery workers of the xylene production and distribution component of the CPUP:</p> <p>The DEIS fails to include an in depth analysis of the adverse impacts of xylene on human health. It instead mentions the possible effects of xylene on humans and attempts to reassure us that Tesoro will not allow any of these impacts to occur.</p> <p>The final EIS must analyze the immediate and long term, cumulative adverse health impacts to refinery workers following a single incident accidental xylene exposure secondary to a spill, to a leak, or to an accidental emission, as well as the cumulative chronic health impacts of a continuous xylene leak, ongoing fugitive xylene emissions, and other daily work exposures that cannot be avoided.</p> <p>The final EIS must include an in depth analysis of the adverse health impacts of xylene on previously healthy individual and on individuals with prior chronic health conditions.</p> <p>The impact of xylene exposure on individuals with the following chronic health conditions, among others, must be addressed in depth: metabolic and endocrine disorders, respiratory disorders including asthma, skin conditions like eczema, cardiovascular problems including hypertension, and neurologic and muscular disorders including seizures.</p> <p>According to the American Academy of Asthma, Allergy and Immunology one of twelve Americans or 8% of the U.S. population have asthma (with up to 15% of asthma cases job related secondary to irritants found in, for example, the petrochemical industry); hypertension, according to the American Society of Hypertension occurs in as many as 1 in 3 adults; 31.6 million</p>	<p>An extended discussion on short- and long-term exposure to hazardous pollutants is provided in Section 3.6.2 of this Final EIS. Table 6 in this Final EIS illustrates different exposure limits based on different exposed populations (general public and workers) for the hazardous pollutants that would be emitted in the event of a spill.</p> <p>Workplace safety requirements are managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. The refinery is required to comply with those regulations independent of the EIS or other regulatory permitting processes. The changes in refinery operations are not substantially different from current refinery operations with regards to handling of flammable materials, training about and protection from hazardous materials, and use of personal protective equipment for hazardous tasks.</p> <p>The refinery's measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Additional information regarding Tesoro's safety improvements and the status of the implementation of the CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to use emission control technologies designed to prevent air quality degradation and comply with health-based air quality standards. Air emissions are discussed in both Chapter 9 and Chapter 4 of the Draft EIS. Section 3.6 of this Final EIS</p>

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		<p>Americans are estimated to have symptoms of eczema; and according to the Epilepsy Foundation 1 in 26 Americans or 4% of the population will develop epilepsy. Given the frequency of occurrence of many of these conditions it should be expected that any one of them will be found in some of Tesoro's refinery workers. The final EIS must contain an analysis of how xylene exposure may exacerbate these prior conditions.</p> <p>The analysis must also explore the adverse health impact of xylene exposure on women of reproductive age, including the adverse effects of xylene exposure on the fetus and its impact on the newborn and subsequent mental and physical development of children exposed to xylene in utero.</p> <p>The final EIS must analyze the potential long term, cumulative economic impact on the families of refinery workers whose health has been harmed by xylene exposure.</p> <p>The final EIS must analyze how Tesoro will keep records of the health of workers involved with the manufacturer and distribution of xylene.</p> <p>The final EIS must analyze in depth the measures Tesoro plans to use to protect the health of the refinery workers, looking at not just spill response emergency preparedness as it does in the DEIS, but also at the existence of, and effectiveness of, any planned monitoring of worker's chronic exposure to xylene. The DEIS assures us that workers are well trained in handling accidents and spills, but nowhere does the DEIS address what occupational health guidelines will be followed by Tesoro to assure the ongoing health of its workers at risk of xylene exposure.</p> <p>The EIS must analyze in depth whether or not Tesoro will conduct periodic health screening, and how effective any screening Tesoro proposes will be in identifying xylene exposure associated abnormalities.</p> <p>For example:</p> <p>Will periodic screening of levels of urinary methylhipparic acid be conducted? When, and how often, will such screenings be done? Increased levels of this urinary metabolite correlate to xylene</p>	<p>provides an expanded discussion on acute and chronic exposure limits for both workers and the general public.</p>

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		<p>exposure and warrant necessary steps to reduce a worker(s)'s exposure to xylene.</p> <p>Will periodic screening be conducted for neurologic abnormalities caused by xylene exposure, including anxiety, forgetfulness, insomnia, depression, confusion and inability to concentrate? How often will such screening occur, and will it occur frequently enough to protect any affected worker and fellow workers from the possibility of an impaired worker making an error in judgment that could negatively impact the safety of the worker and of others?</p> <p>Will workers be screened routinely for muscle incoordination and poor balance, both signs of possible xylene exposure? What will the screening involve and who will do it?</p> <p>The final EIS must analyze in depth what Tesoro will do if a worker is found to have an abnormality secondary to xylene exposure.</p> <p>The final EIS must analyze in depth what education Tesoro will provide workers about the dangers of xylene exposure to their health prior to hiring and throughout their employment.</p> <p>For example:</p> <p>Will women of reproductive age be educated about the possibility of xylene exposure causing fetal harm?</p> <p>Will women of reproductive age be told that studies on animals have shown that xylene absorbed by a mother can cross the placental barrier?</p> <p>Will women of reproductive age be told that animal studies have shown that the offspring of xylene exposed mothers have had problems with motor skills?</p> <p>Will women of reproductive age be educated about the possibility of a spontaneous abortion occurring secondary to xylene exposure?</p> <p>Will workers be told that few studies have been done of the impact of long term exposure of animals to low concentrations of xylene, but some suggest that harm to the kidneys and the</p>	

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		<p>nervous system may occur?</p> <p>Will workers be told that a 2015 study identified xylene as a cause of hormonal abnormalities following exposure to xylene in room air at levels currently considered safe by federal regulators?</p> <p>The DEIS nowhere analyzes the adverse impact to health following chronic exposure to xylene among workers at other petrochemical plants that produce xylene in the quantities similar to Tesoro's proposal. Nor does the DEIS make any proposals for mitigation of the adverse health impacts on workers involved with the production and transportation of xylene based on studies of what safeguards have been effective in protecting workers at other xylene production plants from the impacts of chronic exposure to xylene.</p> <p>The final EIS must analyze in depth the adverse health impacts experienced both acutely and chronically by workers at other refineries that produce and distribute xylene. These analyses must include work-related illnesses diagnosed after someone left a job related to the manufacture and distribution of xylene, and must fully account for chronic conditions that developed post exposure to xylene.</p> <p>The final EIS must analyze in depth records of the adverse health impacts following chronic exposure of workers to xylene at other petrochemical plants. Such analysis must also look in detail at the effectiveness of any safety measures or monitoring procedures used at other xylene plants to protect their workers from the negative health impacts of chronic xylene exposure.</p> <p>Mitigation: There is no truly acceptable mitigation for adverse health impacts caused by the chronic exposure of workers to xylene.</p>	
Ch09-289	Mike Allen	[The draft EIS needs to] ensure refinery workers follow the highest safety standards & an adequate disaster response plan.	The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations as well as an emergency response program (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and

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			<p>operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p>
Ch09-290	AJ Kuntze	<p>I SUPPORT the health and safety of all the refinery workers at Tesoro. Consequently there needs to be a more careful review and analysis of the Chemical Safety Board and Hazardous Investigation Report specifically its findings and recommendations concerning safety management at Tesoro.</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in</p>

ID	Contact	Comment Text	Response
			Section 3.1 of this Final EIS.
Ch09-291	David Perk	<p>The final Environmental Impact Statement should correct the following omissions from the draft version:</p> <p>...</p> <p>Ensure that refinery workers follow the highest safety standards and are protected from the risks of toxic xylene spills (Sightline Institute, The Dirt on Tesoro, http://www.sightline.org/download/48351/).</p>	<p>The refinery has systems in place designed to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to spills and other unplanned events. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Coordination and training between Tesoro and local emergency service providers – Section 11.4</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p>
Ch09-292	Sigrid Asmus	<p>It is imperative that all the matters listed below be included in and considered by those drafting the DEIS:</p> <p>...</p> <p>-- Evaluate the full range of impacts to worker health and safety. The provisions must include protection for worker health and safety by fully supporting and implementing all conditions and mitigations the 2010 Chemical Safety Board findings and recommendations on a point-by-point basis with independent</p>	<p>Additional information on the status of Tesoro’s implementation of safety procedures recommended by the Chemical Safety Board findings since the 2010 explosion is provided in Section 3.6.3 of this Final EIS. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		verification;	
Ch09-293	Edward Chadd	<p>Please ensure that the final EIS:</p> <p>...</p> <p>Protects worker health and safety by fully supporting and implementing all conditions and mitigations recommended in the 2010 Chemical Safety Board findings and recommendations on a point-by-point basis with independent verification;</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p>
Ch09-294	Sloane Winkes	<p>Tesoro has a poor safety record that has led to injury and the deaths of refinery workers. The EIS must evaluate how Tesoro plans to implement safeguards against future injury and death while handling a substance as toxic as xylene.</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding agencies responsible for safety at the refinery and for safety in marine waters is provided in</p>

ID	Contact	Comment Text	Response
			Table 2 in Section 3.1 of this Final EIS.
Ch09-295	Glen Anderson	Evaluate the impacts to worker health and safety and includes protection for worker health and safety by fully supporting and implementing all conditions and mitigations the 2010 Chemical Safety Board findings and recommendations on a point-by-point basis with independent verification	<p>Worker health and safety is managed in accordance with WISHA of 1973 enforced by the Washington State Department of Labor and Industries, DOSH. DOSH periodically inspects the facility to confirm that Tesoro is in compliance with applicable regulations and permit conditions.</p> <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch09-296	Susan Woods	1. Xylene is a very volatile product that is extreme in its effects on workers in the event of a mistake. Research shows that workers in its production suffer many ill effects no matter how many	Thank you for your comment.

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		precautions are in place.	
Ch09-297	Susan Woods	I'm not ignoring the jobs you have maintained over the years and how significant that is. Your employees are your most important resources and treating them well enables your continued profitability.	Thank you for your comment.

Chapter 10: Land Use and Shoreline Use

ID	Contact	Comment Text	Response
Ch10-001	Evergreen Islands	<ul style="list-style-type: none"> • What are the visual or aesthetic impacts of the new facility on existing views or vistas? • What are the visual or aesthetic impacts of additional trains operating in Skagit County 	Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.
Ch10-002	Sally Stapp-Brigham	Tourists will take home photos with tankers at anchorage scattered about. Is that what we want our vacation destination to be known for?	Thank you for your comment.
Ch10-003	Devon Grennan	The proposed project fits within the guidelines for the type of industry that this area is zoned for.	Thank you for your comment.
Ch10-004	Bret Andrich	The proposed project fits within the guidelines for the type of industry that this area is zoned for.	Thank you for your comment.
Ch10-005	Val Veirs	And, are you sure that no part of this project requires a Federal review or permit of some type? For example, if docks are expanded, the Army Corps of Engineers should have to study the situation and this would require by Federal law a Section 7 consultation.	Tesoro would need to obtain a USACE permit prior to commencing with construction work on the wharf (see Section 7.4.1 of the Draft EIS). A list of required permits for the proposed project and responsible agencies is provided in Table 1-1 in Section 1.4.5 of the Draft EIS. Table 1-1 of the Draft EIS identifies a USACE permit required per Section 10 of the Rivers and Harbors Act, which could trigger the need for Section 7 consultation with the USFWS and the NMFS under the Endangered Species Act. Additional information regarding the agencies responsible for regulating the proposed project, including the USACE, is provided in Table 2 in Section 3.1 of this Final EIS.
Ch10-006	Swinomish Indian Tribal Community, Larry Wasserman	Skagit County must enforce the goals and policies of SEPA, the Shoreline Management Act, the Growth Management Act and the federal Coastal Zone Management Act, which all emphasize the protection of natural resources that coincide with protection of our air, cultural resources, and treaty reserved access to harvest finfish and shellfish in this area.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch10-007	Evergreen Islands	<p>LAND & SHORELINE USE</p> <ul style="list-style-type: none"> • Is the proposed project consistent with adopted land use plans and zoning? 	<p>Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.</p>
Ch10-008	Evergreen Islands	<ul style="list-style-type: none"> • What is the compatibility of the proposed project with nearby residential land uses and Padilla Bay National Estuarine Research Reserve and the Fidalgo Bay Aquatic Reserve 	<p>Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.</p>
Ch10-009	Tim Colton	<p>These industrial vessels are a disturbance to ...recreational boaters in the area.</p>	<p>Thank you for your comment.</p>
Ch10-010	Edward John McLeod	<p>Anacortes and Skagit County should focus on ways that they can remain a clean, beautiful and accommodating destination for tourism which most often visits the Pacific Northwest for it's unspoiled beauty and natural treasure. Anacortes and Skagit County should also recognize that some if not much of their tourism success is driven by their neighboring San Juan County and the Salish Sea (perhaps the least overpopulated and unfettered archipelago in the U.S. if not North America).</p>	<p>Tourism, recreation, and aesthetic enjoyment within the study area and the potential impacts on these resources are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4 • Aesthetics and visual resources – Section 10.5 • Tourism and recreation – Section 11.5.1.6
Ch10-011	Ross Reid	<p>In the case of a spill of any kind, it would directly threaten ... the endless forms of recreation that enjoy this environment from Kayaking to waterskiing, sailing and more.</p>	<p>Thank you for your comment.</p>
Ch10-012	Martha Hall	<p>Our inland sea provides wonderful opportunities for recreation and enjoyment of its beauty and wildlife.</p>	<p>Thank you for your comment.</p>
Ch10-013	Constance Snell	<p>Maybe, we should consider who will benefit if the xylene facility is denied. ...Boaters, commercial and sport, will benefit, as there will be less, huge tankers to dodge.</p>	<p>Marine vessel traffic due to the proposed project would use established shipping lanes currently dedicated to industrial use. Marine vessel traffic and associated impacts are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Potential impacts on recreation – Section 10.4.2 • Vessel safety and waterway management – Section 13.4.1.2 <p>The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive</p>

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			control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding recreational boating and vessel traffic, including potential impacts from a marine spill, is provided in Section 3.9.1 of this Final EIS.
Ch10-014	Jolie Wheeling	I live on San Juan Island. I would be most unhappy if this poison was transported through our waters. This is in no way acceptable to me as a waterfront property owner who very much enjoys the fishing and other wildlife that live in and around the water and are dependent upon the purity of the water:	Thank you for your comment.
Ch10-015	Sanford Olson	<p>San Juan County is a Recreational and Commercial Boating, Fishing, and Whale Watching Destination</p> <p>Require the FEIS to fully address all boating activity and Project impacts to all boating activity in the study area, including Washington State Ferries, cruise ships, recreational boats, and whale watch boats. The DEIS tables summarizing the area's vessel traffic do not include recreational or whale watch boats.</p> <p>Require consultation with the Whale Museum for the FEIS. The Whale Museum's Soundwatch Boater Education Program tracks extensive data including recreational and whale watch vessel data. The Whale Museum was not consulted for the DEIS.</p>	Additional information regarding recreational boating and potential impacts to ferry traffic is provided in Section 3.9.1 of this Final EIS. The Whale Museum was notified of the availability of the Draft EIS. In addition, the studies used in the Draft EIS to support the analysis of potential impacts on marine mammals include data from the Whale Museum's Soundwatch Boater Education Program, such as the NMFS's 2008 <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> (see Section 7.3 in the Draft EIS). Additional information regarding potential impacts on the Southern Resident killer whale is provided in Section 3.5.1 of this Final EIS.
Ch10-016	Karmel Ackerman	We are sailers and don't like to navigate through the crowded Salish Sea with more dangerous boats like this! No more chemical ships!	Thank you for your comment.
Ch10-017	Sara Holahan	ES7.8 Recreation This section needed to be expanded. Anacortes and La Conner have big recreational boating communities and tourism which will be affected by vessel traffic and air pollution. This is going to have a very negative affect, yet once again the EIS says the increased future marine vessel traffic "could potentially result in cumulative impacts but are considered negligible". No,	Section 10.6 of the Draft EIS states that increased future marine vessel traffic could potentially result in cumulative impacts. See Section 3.9.1.1 of this Final EIS for additional information regarding recreational boating and increased marine vessel traffic. Additional information regarding agencies responsible for regulating marine vessels, laws, regulations, and guidance for vessel operations is provided in Table 2 in Section 3.1 of this Final

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		they are not negligible, they are serious.	EIS.
Ch10-018	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>The information necessary to properly analyze these impacts is available. The Port of Anacortes' Cap Sante Marina (https://www.portofanacortes.com/marina) is a popular launching site for boaters traveling across Rosario Strait to the San Juan Islands. Cap Sante Marina has over 950 slips and a guest boat capacity of 150 200 boats per night. Whale Watch businesses based in Anacortes include Deception Pass Tours, 5596 Sr 20, Anacortes, WA 98221; Mystic Sea Charters, 819 Commercial Ave and 710 Seafarers Way, Anacortes, WA 98221; and Island Adventures Whale Watching, 1801 Commercial Avenue, Anacortes, WA 98221. All whale watch expeditions that depart Anacortes must cross the project's vessel route in Rosario Strait in order to see whales.</p> <p>The Whale Museum's Soundwatch Boater Education Program tracks extensive data including recreational and whale watch vessel data in the eastern Strait of Juan de Fuca and southern Rosario Strait . The Whale Museum was not consulted on the DEIS. Skagit County should consult with the Whale Museum, the Port of Anacortes and other sources and incorporate available data into the analysis of the impact on vessel traffic. The determination of nonsignificance should be reevaluated and carefully justified in light of this new information.</p>	<p>The Draft EIS discusses recreational resources with regard to increased vessel traffic due to the proposed project in Section 10.4.</p> <p>Additional information on recreational boating and increased marine vessel traffic is included in Section 3.9.1.1 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessels, laws, regulations, and guidance for vessel operations is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The Port of Anacortes and the Whale Museum were notified of the availability of the Draft EIS. In addition, the studies used in the Draft EIS to support the analysis of potential impacts on marine mammals include data from the Whale Museum's Soundwatch Boater Education Program, such as the NMFS's 2008 <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> (see Section 7.3 in the Draft EIS). Additional information on potential impacts on the Southern Resident killer whale is included in Section 3.5.1 of this Final EIS.</p>
Ch10-019	Evergreen Islands	<ul style="list-style-type: none"> • What are the potential negative effects on local and regional recreational resources (i.e. parks, trails, and the Salish Sea, the San Juan Island Archipelago, Padilla Bay and Fidalgo Bay)? 	Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.

Chapter 11: Social and Economic Environment

ID	Contact	Comment Text	Response
Ch11-001	Dan Cameron	I think it will be great to see ships sailing out of Puget Sound with a product rather than sailing in with products to improve our balance of trade.	Thank you for your comment.
Ch11-002	Martha Hammer	3. What will be the effect on the wonderful quality of life we have here in the Pacific Northwest?	Thank you for your comment.
Ch11-003	Bill Bowman	So the EIS draft regarding the xylene plant in Chapter 11, Page 28, assumes the negative impacts spilled would only last two to three days because 99 percent evaporates or dissipates. Well, later -- you know, Chapter 11, Page 29 -- they mentioned -- regarding consumable fish, following a spill, would carry -- would -- would carry a stigma, attached to the toxicity in our waters and does the food chain. Well, Jesus, stigma? It's certainly poisonous. I'd call it more than a stigma.	Thank you for your comment.
Ch11-004	Will Golding	How does the \$400 million price of the upgrades compare to increased economic benefits for the community? Is this an equitable investment for the community and the State of Washington? Are as much out of this project as Tesoro?	The purpose of the EIS is to provide an analysis and discussion of significant environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality (WAC 197-11-440). The Draft EIS analyzes beneficial and adverse impacts of the proposed project and the measures being taken to avoid or minimize potential impacts in Chapters 3 through 13. While positive and negative impacts of the proposed project are discussed in the EIS, the lead agency is not required to conduct a formal cost-benefit analysis when preparing an EIS. Rather, "SEPA contemplates that the general welfare, social, economic, and other requirements and essential considerations of state policy will be taken into account in weighing and balancing alternatives and in making final decisions. However, the environmental impact statement is not required to evaluate and document all of the possible effects and considerations of a decision or to contain the balancing judgments that must ultimately be made by the decision makers. Rather, an environmental impact statement analyzes environmental impacts and must be used by agency

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			decision makers, along with other relevant considerations or documents, in making final decisions on a proposal (WAC 197-11-448).”
Ch11-005	Sigrid Asmus	This massive source of new potential pollution, if it is allowed, must be accurately calculated and regulated now, so that the true cost to Washington State's economy, fisheries, Tribes, tourism, and health can be calculated. It is essential that the board require full identification of the massive threat represented by the Tesoro proposal. Without that assessment, Washington State would allow Tesoro to shift the costs of its damages, as well as its mitigation costs and responsibility, directly and entirely on to Washington State.	Section 13.1 of the Draft EIS discusses the requirements of OPA 90 for marine transportation of petroleum-based materials for the proposed project, including responsible parties for spill oil removal and financial damages resulting from spills. As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations. Additional information regarding regulatory requirements for spill response and readiness is provided in Section 3.9.4 of this Final EIS.
Ch11-006	Richard Bell	<p>Though I appreciate the need for jobs, and the economic realities that face communities, corporations and investors, I also recognize that beyond all that, there is a more fundamental value at stake here.</p> <p>Long before industrial economies and communities dotted the landscape, local people lived closer to the land. Early inhabitants of this region lived off the plentiful resources of the land and sea. These people recognized that their health and survival was intertwined with the natural wildlife communities that surrounded them.</p> <p>Though industry and economies have taken on a proverbial life of their own, we are still- at the basic core, dependent upon the health of our air, water and the vast web of life that surround us.</p>	Thank you for your comment.
Ch11-007	Faye Bartlett	The rights and welfare of the Squamish Tribe should be decisive factors in decision making. Please base your decision on the welfare of everyone, not on the economic future of Tesoro Co.	The Draft EIS discusses treaty rights and traditionally used resources, including those of the Squamish Tribe, in Sections 11.5.1.5 and 11.5.2.3. Tribes were invited to provide input to the Draft EIS. See Section 1.4 of the Draft EIS for details on engagement with tribes, agencies, and other interested parties.

ID	Contact	Comment Text	Response
Ch11-008	Elisabeth Robson	A spill will likely destroy the tourism business completely, as well as have a heavy impact on the fishing business. We will lose many thousands of jobs. It would also affect housing prices, and thus many other businesses in the area.	Thank you for your comment.
Ch11-009	Elisabeth Robson	Will this [a spill] dissuade people from wanting to live in the area? It certainly would me if I didn't already live here.	SEPA requires the consideration of environmental impacts, including direct, indirect, and cumulative impacts, with attention to impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). Potential impacts to perception in the event of a marine spill are speculative, and not quantifiable in nature. These impacts are therefore not analyzed in the Draft EIS.
Ch11-010	Elisabeth Robson	The EIS MUST include potential damage to our region's "beautiful marine environment" brand from all project-related fuel and cargo spills, including the impacts to tourism, vacation and retirement home revenues, and fisheries — impacts that will persist longer than the duration of any spill.	<p>The Draft EIS discusses tourism, recreation, and aesthetic enjoyment within the study area, potential impacts on these resources, and measures that would be in place to prevent or minimize impacts to these resources in the following sections:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4 • Aesthetics and visual resources – Section 10.5 • Economic environment, including tourism and recreation – Sections 11.5.1.6, 11.5.2, and 11.6.2 <p>SEPA requires the consideration of environmental impacts, including direct, indirect, and cumulative impacts, with attention to impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). Potential impacts to perception in the event of a marine spill are speculative, and not quantifiable in nature. These impacts are therefore not analyzed in the Draft EIS.</p>
Ch11-011	Mary Heath	Clean water is critical for our residents and the many tourists who come to our region, attracted by our pristine environment.	Thank you for your comment.
Ch11-012	Bill Bowman	Also in reference to chapter 11, page 29 of the DEIS regarding consumable fish, there is mention of a "stigma" attached to the toxicity in the waters (as well as the food chain). This is highly understated and were a spill to occur, it would have a significant impact on the natural, social, and economic environment. I would not want to eat fish harvested from contaminated waters after a	Thank you for your comment.

ID	Contact	Comment Text	Response
		spill of any kind.	
Ch11-013	Sanford Olson	<p>My concerns about the Project include the following:</p> <p>...</p> <p>3. Impacts to San Juan’s economy. A shipping accident or spill from Project vessels could impact our essential dependence on reliable and continued ferry transportation of goods and people. Any significant disruption to our transportation system could result in risks to our food inventory, availability of medical services, tourism, and commerce.</p> <p>Our tourism and retirement economy depends on the natural beauty and health of our environment, the abundance and variety of our wildlife, and in particular our Orca. All of this is put at risk by this project.</p>	Thank you for your comment.
Ch11-014	Sanford Olson	<p>Economic Impacts to San Juan County</p> <p>The DEIS does not address the significant economic impacts that can result from public perception following a spill. This can apply to tourism, real estate, and resources such as fisheries.</p> <p>Experience from the Exxon Valdez and Deepwater Horizon spills show that oil spills impact market perceptions of seafood from the spill area, even seafood from areas that are not directly affected by the spill. The State of Alaska had to address market perceptions of all Alaskan seafood during and following the Exxon spill. It is therefore reasonable to assume that shellfish and fish from the entire Salish Sea could suffer from adverse market perceptions of quality and safety during and after a spill. Fisheries in proximity but unaffected might well be closed as a precaution. Once closed, it can take weeks or months to develop adequate data to reopen those fisheries. These likely economic impacts to the region are not considered in the DEIS.</p> <p>Require the FEIS to address economic impacts, including impacts to land use and shoreline use from spills of all Project related vessel cargos and propulsion fuels, complicated by adverse weather conditions.</p>	<p>The Draft EIS discusses potential impacts to social and economic resources within the study area, and measures that would be in place to prevent or minimize impacts to these resources in the following sections:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4 • Aesthetics and visual resources – Section 10.5 • Economic environment, including tourism, recreation and fisheries – Sections 11.5.2 and 11.6.2 <p>Section 11.5.2.4 of the Draft EIS includes analysis of a potential stigma on fish harvested from marine waters in the event of exposure to a marine spill. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). Potential impacts to perception in the event of a marine spill are speculative, difficult to quantify and are therefore not analyzed in the Draft EIS.</p>

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		<p>Require the FEIS to address the “beautiful marine environment” brand damage from spills of all Project related vessel cargos and propulsion fuels. This would include the direct impacts from Project spills, the impacts to tourism, vacation home, and retirement home revenues (both employment income and tax receipts), and fisheries (employment income and costs to businesses) all of which would last much longer than the duration of any spill.</p> <p>Require the FEIS to update Table 11-10: Travel-Related Economic Data with more current Dean Runyan Associates data for Washington State County Travel Impacts and Visitor Volume (DEIS Table 11-10 uses outdated data from 2010). Require the update to this table to include Whatcom County along with San Juan, Island, Jefferson, and Clallam counties. Whatcom County would also be impacted from project related marine spills and spill response.</p>	
Ch11-015	Joseph Stivala	<p>Tesoro is a committed company, and if no permit is issued they will still follow the new regulations, which has a huge impact on the viability of the company and the location. In meeting these requirements without a permit to build the units this will force the location to run less crude oil, buy more expensive sweeter forgone crude slates and ultimately make the location not a good asset for a growing company. Think of the money taken from the community if the plant were to shut down, or if a smaller unknown company that has a much poorer safer and environmental record than Tesoro...again having huge impacts to our community.</p> <p>I need the government of Skagit County to realize this is a local, family, and community decision.</p>	Thank you for your comment.
Ch11-016	Rebecca Spurling	<p>I am committed to continuously improving our refinery operations and implementing technology that makes a measurable difference to our community and quality of life. The CPUP provides that opportunity through increased jobs in our community, making the refinery more viable for future generations, improving our overall operations by reducing air emissions, and producing cleaner burning gasoline.</p>	Thank you for your comment.

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Ch11-017	Brett Powers	Projects such as the CPUP set a high standard for others in the industry and Tesoro is committed to supplying the need for fuels and other petroleum refined products in a responsible and compliant manner, with a commitment to co-existing in the communities in which we operate.	Thank you for your comment.
Ch11-018	Dennis Parent	Two other growth sectors will be tourism and upper income retired people. A xylene facility would be a big negative for ...these groups..	Thank you for your comment.
Ch11-019	Tom Boland	<p>We'd like to show our support of the Clean Product Upgrade Project that Tesoro Anacortes is pursuing. We recognize that an investment of this nature is an investment in our community. Skagit Farmers Supply depends on a reliable local source of fuel for our farmers. Timing is everything on the farm. As this spring is showing, when the rain stops, the planting will start. We'll be delivering fuel daily to the farms as their equipment will often burn thru their supply a few times a week. That slows in the summer, but during the harvest, that cycle will repeat itself. We need that local supply to ensure a crop can be planted in a timely manner.</p> <p>We also count on Tesoro for local propane supply when it gets cold outside. Propane is widely used as a primary heat source in Skagit County, Island County and across the San Juan Islands. Every bit of propane that can be manufactured locally is a benefit to our communities that head with this clean burning gas.</p> <p>Major investment such as this one that Tesoro is making, is an investment in our future and impacts the quality of life in our community. This impact can be felt from the level of community support that Tesoro engages in to the quality of the jobs they create. My wife and I live in Anacortes and we see that support first hand at the different festivals and events in the city. WE also see it in school as we meet many parents that work at Tesoro.</p> <p>Skagit Farmers Supply continues to make upgrades. As these improvements are made, we end up with equipment that is safer and more efficient. We are able to do more with less energy and</p>	Thank you for your comment.

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		time.	
Ch11-020	Carl Ullman	<p>5. Economic and quality-of-life impacts. The DEIS’s analysis of the impacts to the regional economy of a spill or related accident is too narrow. Most distressing is the DEIS’s view that in the event of an accident local families can simply defer their recreational or resource harvesting outings until another time. But there is an enormous difference for those families between living in an environment where such things must be accommodated as part of life, and in an environment where they don’t happen in the first place. The former deeply compromises the attributes that give our area its special value; the DEIS cannot ignore this by treating accidents as one-off events of no lasting effect. Tomorrow is not a brand new day in which I will have forgotten yesterday’s calamities.</p> <p>Similarly, the DEIS looks at the temporary loss of immediate employment due to a project-related accident as though there would not be any lasting impact. And while correctly expecting that potential visitors will visit elsewhere for the duration of the accident, the DEIS does not take into account the more lasting impact of our region’s loss of its reputation as an area of remarkable natural beauty whose residents protect it as such.</p>	Thank you for your comment.
Ch11-021	Swinomish Indian Tribal Community, Larry Wasserman	<p>Unfortunately, we find that this DEIS discusses impacts in a recurring manner that lacks analysis of these tribal interests. The document provides a great deal of general background information, with little to no original analysis of the actual significant impacts of this project on issues of concern to the Tribe. For example, the DEIS purports to discuss impacts to tribal treaty protected resources, but then acknowledges that those impacts have not been examined:</p> <p>Because specific gathering areas or plants important to tribes have not been identified in the study area to date, no impacts from the proposed project were identified. If gathering areas or important plants were identified through coordination with the tribes, it would be possible to assess impacts. Because specific hunting areas or certain terrestrial animals important to tribes have not</p>	<p>The Draft EIS analyzes impacts from a spill on fish and fishing, impacts to treaty and traditionally used resources, environmental justice, and cultural resources in the following sections:</p> <ul style="list-style-type: none"> • Impacts on fish from a spill – Section 7.4 • Treaty rights – Section 11.5.1 • Impacts to tribal fishing – Section 11.5.2 • Treaty and traditionally used resources – Section 11.5.2.3 • Environmental justice – Section 11.7.2 • Cultural resources – Section 12.4 <p>The spill analysis included xylenes and reformate because those are the new products associated with the proposed project. A discussion of vessel fuel spills is included in Section 3.9 of this Final EIS.</p>

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		<p>been identified in the study area, no impacts from the proposed project were identified. If hunting areas or important animal species were identified through coordination with the tribes, it would be possible to assess impacts.</p> <p>DEIS at 11-27 (Environmental Justice).</p> <p>With respect to impacts on treaty fishing areas, the DEIS again only acknowledges their proximity and states generically (without data or analysis) that "depending on the degree of these impacts, treaty resources, traditional lifeways, health, and the culture of the Swinomish and other tribes could be affected due to degradation of their fisheries." DEIS at 11-28 (Environmental Justice).</p> <p>The DEIS makes no effort to quantify or even describe the potential impacts of a spill on tribal fisheries and describes any impacts as temporary and therefore insignificant. This discussion fails to acknowledge the true scope of impacts, and fails to address any type of spill except xylene. As if to put the burden on tribes to provide this analysis, the DEIS then states, "Tribes are invited to comment on potential impacts." DEIS at 11-29 (Environmental Justice). With all due respect, SEP A does not require the Tribe to do the analysis of potential impacts to the Tribe; that responsibility is placed upon the applicant and the lead agency.</p>	<p>Please see Section 3.8 of this Final EIS for detailed responses to Swinomish letter comments and other similar tribal letter comments regarding tribal treaty protected resources, vessels, spills, and access to fisheries.</p>
Ch11-022	Will Golding	<p>Have environmental justice impacts been considered in terms of impacts on the local communities who live in the area, as well as the potential impacts on other communities around the Salish Sea if there is any contamination of local water bodies?</p>	<p>The Draft EIS discusses environmental justice in Section 11.7.</p>
Ch11-023	Swinomish Indian Tribal Community, Larry Wasserman	<p>As an additional flaw, Chapter 11 of the DEIS does not include a reasonably thorough review of environmental justice impacts to the Tribe.</p>	<p>The Draft EIS analyzed the potential for impacts to minority and low-income communities to be disproportionately high and adverse as a voluntary protective measure for local communities.</p>
Ch11-024	Swinomish Indian Tribal Community	<p>I. Xylene Project Air Quality Impacts Impacts on air quality and Tribal health from the proposed project are a major concern for the Tribe and its members. Despite the Tribe's repeated calls for thorough study of this issue from an environmental health and justice standpoint, including during EIS Scoping, air quality impacts to the Swinomish Reservation and to tribal members are not</p>	<p>Please see Section 3.8 of this Final EIS for detailed responses to Swinomish letter comments and other similar tribal letter comments. An expanded discussion of the meteorological data selected for modeling and tribal land impacts (including ozone-related impacts, north-wind conditions, and toxic air pollutants) is included in Section 3.8.1.1 of this Final EIS. Additional</p>

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		adequately addressed in the DEIS.	information regarding agencies responsible for regulating the emissions from new or modified sources at the refinery is provided in Table 2 in Section 3.1 of this Final EIS.
Ch11-025	Elisabeth Robson	The final EIS must include the impact to the real estate values and desirability of the area...Yet another refinery in the area could impact the decision of people to move to the area;	The proposed project includes infrastructure additions and upgrades to the existing Tesoro Anacortes refinery (see Chapter 2 of the Draft EIS) and does not include the construction of a new refinery. The Draft EIS discusses impacts to property values of the proposed project in Section 11.3.2.2.
Ch11-026	Sara Holahan	ES7.9 Housing It states that there would be enough local housing stock to accommodate new employees. This may be so for the 20 permanent positions but previously the report mentioned 200 temporary workers. With a vacancy rate of less than 1% in Skagit County, this would definitely be an impact. Where are these people going to live? How many people will become homeless during this construction period that takes over local housing?	As discussed in Section 11.3.2.1 of the Draft EIS, due to the local presence of a skilled workforce in Skagit County and the proximity of the proposed project area to other population centers, it is anticipated that construction jobs could be filled by local workers who would commute to the proposed project area, rather than needing to relocate. Therefore, noticeable impacts on the availability or cost of housing for other residents are not anticipated.
Ch11-027	Veronica Bush	Many people come to the area to whale watch and kayak in hopes of a view. Not only would this be putting people's livelihoods on the line because of the proposed risk to the whale watching industry, but taking it one step further.	<p>The Draft EIS discusses the increase in vessel traffic as a result of the proposed project in Section 13.3 and the potential for marine spills in Section 13.5. The potential impacts on recreationists and the whale watching industry in the Salish Sea resulting from increased marine vessel traffic and unplanned events such as spills in the marine environment are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Land and shoreline use, recreation and views, including recreational boating and whale watching – Sections 10.3.2, 10.4.2, and 10.5.2 • Economics/employment income – Section 11.5.2
Ch11-028	Deborah Javelet	I just wanted to pass along my concerns about the introduction of Xylene into our Anacortes community. From what I've read it will generate about 500 construction jobs for the project, but only about 20 jobs permanently.	During construction, the proposed project would employ an average of about 190 construction workers with a peak number of about 270 temporary construction workers (see Section 2.7.2 of the Draft EIS). During operation, the proposed project would employ 20 additional full-time workers annually (see Section 11.5.2 of the Draft EIS).

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Ch11-029	Chris Swenson	I have lived in Skagit county for 20 years and want to live the rest of my life here, but if we can't keep modernizing the refinery it will take jobs and careers out of the area. The CPUP upgrade can be done safely and environmentally friendly while giving Anacortes and Skagit county a future in the industry.	Thank you for your comment.
Ch11-030	Ryan Holewinski	The project will inevitably create jobs in this area, and when I say jobs, I mean jobs that can sustain families. Jobs that pay taxes to benefit the surrounding area. Jobs that turn into great careers.	Thank you for your comment.
Ch11-031	[Name not provided]	<p>Any American company that puts people back to work should be supported in these tough economic times.</p> <p>The economy depends on trade. It creates jobs working the railroads and ships, at refineries, loading cargo at ports, growing crops for export, and building the infrastructure necessary to support a trade-based economy.</p> <p>The employment at our refineries is detrimental to the economy of our communities and affects all sectors of business from the coffee baristas, restaurants to laundry mats and even our parks. Please consider the great impact that is being considered to our communities as a whole.</p>	Thank you for your comment.
Ch11-032	John McCollister	<p>The proposed plant does not create meaningful numbers of jobs in Anacortes... it is the kind of plant that does not benefit a local island community.</p> <p>Please reject the addition of this plant on Fidalgo Island.</p>	Thank you for your comment.
Ch11-033	David Wilson	This project will provide additional local jobs, at income levels much higher than the local average, and a long term influx of capital into our local economy.	Thank you for your comment.
Ch11-034	David Wilson	The product diversification which will enhance the long-term viability of the refinery by enabling it to produce new products that are used in manufacturing in addition the transportation fuels currently produced. A significant investment that will result in	Thank you for your comment.

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		increased tax revenue to multiple governmental jurisdictions.	
Ch11-035	Colin Rockenbach	<p>Please support American jobs.</p> <p>Tesoro's Clean Products Upgrade Project will bring more family wage jobs to the area. It will also help keep Tesoro viable in a competitive market. I don't want to shut down Tesoro and import gasoline from China or Russia.</p>	Thank you for your comment.
Ch11-036	Joseph Stivala	<p>Community. This project is about the community, the permit approval has huge benefits for our community. As a Skagit county resident I know how important the refineries are to us, political views aside we cannot deny the economic benefits from growing industry. The denial of the permit from opposes outside of OUR community's demise. The refinery's supply 30% of Skagit County's tax %! Revenue. This project will only increase that number, not including all of the local jobs that will stimulate the local economy.</p>	Thank you for your comment.
Ch11-037	Mike Conlan	<p>Using the the local economy and jobs is no longer an adequate excuse for polluting the Sound & the planet as a whole.</p>	Thank you for your comment.
Ch11-038	Landis Lutton	<p>Please look at the positive impacts this has to our environment and community . Over 1 million dollars to donations on our schools, community, and charities. Many more jobs. 30% of the skagit county tax revenue.</p>	Thank you for your comment.
Ch11-039	Terry Brazas	<p>As a bonus, I see the value of helping boost the local community within Skagit County and beyond.</p>	Thank you for your comment.
Ch11-040	Steve Berentson	<p>Its investment also represents commitment to the future at a plant that for many decades has provided family wage jobs.</p>	Thank you for your comment.
Ch11-041	Matthew Breland	<p>I am in complete support of this project. It would be a huge financial and jobs creating bonus for Skagit County. Please vote yes.</p>	Thank you for your comment.
Ch11-042	David Corrion	<p>It makes great economic sense to the community by creating</p>	Thank you for your comment.

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		additional jobs during the construction and operations phase.	
Ch11-043	Mark Burris	I am encouraged by the projected increase of staffing, adding 20 new staff.	Thank you for your comment.
Ch11-044	Greg Forney	Tesoro has provided a living for me and now my sons for over 25 years!	Thank you for your comment.
Ch11-045	Greg Forney	They [Tesoro] are responsible for the livelihood of so many families that rely on, or are associated with people that work and spend money in our great Skagit county!	Thank you for your comment.
Ch11-046	Mary Sinker	<p>This proposal aims to increase the economic viability of the Tesoro Anacortes facility. The proposed project will also allow the refinery to meet the clean fuel standards that went into effect on Jan. 1, 2017 which the current equipment does not support. The refinery's economic contribution to the Skagit Valley is significant through direct employment and the impact on other jobs in the community. Refinery employees need housing and by extension other services in the retail, healthcare, entertainment, and recreation industries. The project will employ temporary construction workers in several trades further increasing the economic contribution to the local community.</p> <p>The economic benefits must not outweigh the environmental and public health risks associated with the manufacturing and transportation of xylene.</p>	Thank you for your comment.
Ch11-047	Brett Powers	Tesoro has been an excellent employer in our area for almost 19 years. Projects such as the CPUP will generate up to 20 full time jobs, and approximately 400 part time construction jobs. These are high paying, living wage jobs that the neighboring communities and Skagit County will benefit from. The Tesoro Refinery has also been a significant source of tax revenue for multiple government jurisdictions, as well as contributions made to local organizations such as United Way, Adopt a Family, Boys and Girls Club to name a few. Projects such as the CPUP not only have certain compliance elements to them that are necessary to meet new government	Thank you for your comment.

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		regulations, but also help to ensure the long term viability of one of the most significant employers in Skagit County.	
Ch11-048	Sarah Hammock	CPUP shows Tesoro's intention to continue investing in Skagit County.	Thank you for your comment.
Ch11-049	Dennis Parent	My own vision of our future in Skagit Valley includes attracting high tech companies, whose employees would love to live here for many reasons. Those companies and great jobs could be ours. We can help make it happen by focusing on the infrastructure they need, and by protecting the great way of life we enjoy here. A xylene facility would be a big negative for [this group]...	Thank you for your comment.
Ch11-050	Dennis Parent	As for the good jobs in farming and industry we already have, let's take care to ensure that they remain here and remain successful. I have alot of friends and neighbors who have made their careers working at the refineries, and I care about them. Let's take good care of those jobs.	Thank you for your comment.
Ch11-051	Jeff Schwab	<p>This project will benefit my community in the following ways.</p> <p>Provide temporary jobs during construction that will stimulate local economy through hotel accommodations, food and beverage sales, and sales tax revenue.</p> <p>Provide additional fulltime/good paying jobs at Tesoro and jobs indirectly form the dollars those jobs put back into the community.</p>	Thank you for your comment.
Ch11-052	Frank Salseina	Also [the project is] a huge needed boost in the local economy.	Thank you for your comment.
Ch11-053	LeeAnn Chastain	It is absolutely NOT true that we must support any action that may increase a very small number of local jobs. We must always weigh the total impact of such a change.	Economic benefits of the proposed project are discussed in Sections 11.5 and 11.6.Chapters 3 through 13 of the Draft EIS analyze potential impacts to all elements of the environment, as required under SEPA.
Ch11-054	Ross Reid	In the case of a spill of any kind, it would directly threaten the livelihoods of the fisherman & shellfisheries in the Salish Sea,	The potential impacts of spills in the marine environment on both aquatic life and fisheries were analyzed in the Draft EIS. Additional details can be found in the following sections of the

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			<p>Draft EIS:</p> <ul style="list-style-type: none"> • Economic risks to fishermen in the event of a spill – Section 11.5 • Risks to aquatic life in the event of a spill – Section 7.4.3 • The behavior of spilled materials in the marine environment, the likelihood of a spill, and the measures in place to respond to spills – Section 13.5 <p>Additional information regarding marine spill modeling, likelihood, and response, and potential impacts to aquatic life is provided in Sections 3.9 and 3.5.2 of this Final EIS.</p>
Ch11-055	Ross Reid	It may be difficult to put a price tag on something as intangible as our amazing ecosystem in this area, but if it's damaged we would lose hundreds of thousands of dollars in eco-tourism that would have a crippling trickle-down effect on all the small communities around the PNW that depend on this.	<p>The Draft EIS discusses tourism, recreation, and aesthetic enjoyment within the study area, potential impacts on these resources, and controls that would be in place to prevent or minimize impacts in the following sections:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4 • Aesthetics and visual resources – Section 10.5 • Tourism and recreation – Section 11.5.1.6, 11.5.2 and 11.6.2
Ch11-056	Jim Sasken	Please think about this permit for this project with an open mind and make a decision that will help this economy in this area. We already have a hard time keeping our children and grandchildren close to us because of the available jobs. It is a great community with a lot of support from our friends at Tesoro who support this community with a so much charity and volunteer work throughout the community.	Thank you for your comment.
Ch11-057	Bruce Becker	In addition, the jobs value that tourism adds to this beautiful region far outweighs any benefits to employment.	Thank you for your comment.
Ch11-058	Dan Cameron	As a fourth generation Skagit Valley resident, retired Tesoro employee and current small business owner in Mount Vernon I believe this project which improves the future viability of the Refinery and American manufacturing jobs is in the best interests of the majority of citizens in Skagit Valley, Washington State and the United States.	Thank you for your comment.

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Ch11-059	Dan Cameron	The construction of the \$400 million dollar project will employ 200 construction workers and the ongoing direct employment is projected to be up to 20 full time Refinery positions, which adds over 11 living wage jobs for each position added at the Refinery (220 jobs).	Thank you for your comment.
Ch11-060	Kim McCary	I live here, I value our natural habitat, and as a Salish Sea Steward, I am fearful of the possible destruction of our very fragile local ecosystem that is so important to our local and regional fisheries as well as our eco tourism that is so important to our economy.	Thank you for your comment.
Ch11-061	Larry Bishop	We need the jobs, build it.	Thank you for your comment.
Ch11-062	John Huntley	It [the CPUP] will have a long-lasting economic impact for the people of Skagit County that will improve the life of many in Skagit County and the outlying areas. It will bring high paying jobs to the area-- that is much needed. We should all thank Tesoro for investing 400 million dollars to improve their facility and bring more jobs to the area. This project should be approved.	Thank you for your comment.
Ch11-063	Elizabeth Scholze	In addition to the many and extreme public health risks, there are potential economic calamities as well. The cost of responding to fire or explosion will impact my community, and the county, as first responders will have to respond from all over the area. Moreover, the negative press with the plant will impact property values and tax base.	<p>The refinery maintains its own firefighting resources in addition to mutual aid agreements with industrial neighbors and other refineries to respond to petroleum fires or explosions. The Draft EIS discusses potential impacts on human health, social and economic environment, and public services to respond to unplanned events (including fires, explosions, and spills) in the following sections:</p> <ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Human health – Chapter 9 • Potential impacts on land use – Section 10.3.2 • Existing fire services – Section 11.4.1.2 • Potential impacts to public services, including police, fire, and emergency response – Section 11.4.2 • Economic resources: employment income and tax receipts –

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			<p>Section 11.5 and 11.6</p> <p>Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations). Costs associated with cleaning up spills and paying damages to those that have been harmed by a spill are covered under federal regulations. Additional information regarding emergency response planning and coordination and cleanup costs in the event of a spill is provided in Section 3.7 and in Table 2 in Section 3.1 of this Final EIS.</p> <p>SEPA requires the consideration of environmental impacts, including direct, indirect, and cumulative impacts, with attention to impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). Potential impacts to perception in the event of a marine spill are speculative, and not quantifiable in nature. Perception impacts are therefore not analyzed in the Draft EIS.</p>
Ch11-064	Tom Decker	<p>Beyond the environmental benefits, consider, too, the importance of this \$400 million investment at the refinery and what the industry means for the community. The goal for many on Fidalgo Island is a strong private sector, supported by a healthy business community, to boost the region's overall economic vitality. A vibrant economy with strong, middle income jobs provides the funding for important public services like education, social safety nets, parks, roads and transit, all essential to a healthy, sustainable community.</p> <p>Last year, the local Chamber of Commerce commissioned a study by Western Washington University's Center for Economic and Business Research (CEBR). No surprise that the study showed a significant number of jobs (7 percent on Fidalgo Island) are connected to the refineries. More telling is the finding by CEBR that when it comes to wages, petroleum refining serves as a key benchmark in Skagit County because less than 0.25 percent of the workers in the county are in industries with a higher average annual wage while 98 percent are in industries with a lower average wage.</p>	Thank you for your comment.

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		<p>The CEBR modelling also indicates that each refinery job produces a job multiplier of 2 on Fidalgo Island. Again, it was not surprising that Western’s report labeled the refineries “a significant localized multiplier” for employment. The simple summary: this is an industry that generates and sustains a substantial portion of the local and regional economy for the benefit of many on the island.</p> <p>These factors become more important when you consider that household incomes in Skagit County generally lag state averages. According to the U.S. Census Bureau, Skagit County's median household income in 2013 was \$52,448, which was below the state median household income (\$58,405), In 2013, 17.8 percent of Skagit County's population was estimated to be living below the official poverty line.</p> <p>For this area to improve its outlook for strong, family wage jobs, the Tesoro proposals reviewed in the DEIS are essential. In order to have a healthy quality of life in Anacortes, we need more private sector jobs and the benefits of the proposed Tesoro Upgrade Project.</p>	
Ch11-065	Mike Levine	It also helps to ensure the longevity and profitability of the refineries, that jobs stay local to this community and aren't sent someplace else.	Thank you for your comment.
Ch11-066	Mike Levine	This project will also create new jobs. And, as mentioned, it helps to retain jobs. And these highly paying jobs have an important multiplier effect locally and statewide as well. The construction project will bring a significant amount of revenue to the local economy.	Thank you for your comment.
Ch11-067	Bill Johansen	We've had a beneficial relationship with Tesoro, and we appreciate the contributions to the economics of Washington State and Puget Sound. They have helped provide stable, well-paying jobs and contracts to support companies such as ours.	Thank you for your comment.
Ch11-068	Stephanie Buffum	I'm a resident of Shaw Island. 16 years ago, I was a founding member of the San Juan County Economic Development Council. And it's with great pride that I -- I view the importance of our	Thank you for your comment.

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		waters and the safety of our waters not just for all of us out in the islands or here on Fidalgo, but for the eight million residents that call the Salish Sea home. Over 300,000 people are visiting the San Juan Islands on an annual basis. Our economy is driven strongly by clean water, clean abundant resources, fish, and wildlife.	
Ch11-069	Steven Elliser	And the jobs it will create -- maybe you don't know, these jobs -- one of them could support a family of four in Anacortes. These are far above average jobs. They're very safe...	Thank you for your comment.
Ch11-070	Steve Garey	The benefits to our community go well beyond the many local construction jobs and new union refinery jobs this project represents. The new refinery jobs alone are thought to drive an economic multiplier of 10, which may result in as many as 200 new jobs in this community	Thank you for your comment.
Ch11-071	Colin Stewart	Thank you all for being here. I really appreciate your time, you all being here to support, because we all love -- it's impossible to ignore the economic impact that petroleum manufacturing has in Anacortes. A report of the [unintelligible] in 2013 show that the two refineries provide 12 percent of the jobs in Anacortes and \$109 million. That's 29 percent of all wages generated in Anacortes -- in wages.	Thank you for your comment.
Ch11-072	Colin Stewart	The Seattle County Visitors Bureau estimates that visitors spend \$189 million in 2015. Would travelers be so keen to come here if they knew the extent to which the refineries were polluting, to which the people call [unintelligible] present and Padilla Bay?	<p>The Draft EIS discusses tourism, recreation, and aesthetic enjoyment within the study area, potential impacts on these resources, and measures that would be in place to prevent or minimize impacts to these resources in the following sections:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4 • Aesthetics and visual resources – Section 10.5 • Tourism and recreation – Sections 11.5.1.6, 11.5.2, and 11.6.2
Ch11-073	Stephanie Hamilton	Beyond the potential impacts to our local natural resources, we need to be mindful of the impacts of our local economy, which has a direct impact on the quality of life here in Anacortes and the surrounding communities -- like this school is being rebuilt. Aren't	Thank you for your comment.

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		<p>we excited? This project is a \$4 million project in our local economy. It will create 20 additional full-time jobs, which will translate into 20 full-time jobs here on Fidalgo Island, according to a study that our chamber commissioned last year from the Western Washington University Center for Economic and Business Research. As included in the Draft EIS, this project will result in an increase of approximately 55 million in total wage income for jobs in the construction, scientific, technical, and transportation sectors. It will also create nearly 450 non-refinery jobs, each with an average salary of \$177,000, lasting for the entire 19-month duration of construction. When the project is complete, we will have 20 full-time jobs at the refinery -- that I mentioned earlier -- with an average salary of over \$121,000, as well as a refinery that is better equipped to diversify its production and respond to future market changes.</p>	
Ch11-074	Barb Cross	<p>Tesoro claims an increase in good paying jobs and an increase in tax revenue - helping the economy. Perhaps helping the 20 workers expected to be hired. Or the construction companies during the build process. But at what cost to the residents, local marine industry, tourism, marine life, or even future generations? At some point the quality of life we all want to enjoy here has to come before the bottom line. Is this really worth even the slightest possibility of destroying a way of life for thousands of people? Or damaging the environment?</p>	Thank you for your comment.
Ch11-075	Martha Hammer	<p>2. What will the economic effect of an increase in shipping of fossil fuel/fossil fuel products and the resulting increased risk of spills be on people making their living in the fishing industry and recreation industry?</p>	<p>The Draft EIS discusses economic impacts of the proposed project, including those to employment income and tax receipts in the fishing and tourism industries, in the following sections:</p> <ul style="list-style-type: none"> • Employment income – Section 11.5.2 • Tax receipts – Section 11.6.2
Ch11-076	Martha Hammer	<p>4. Does protecting the Salish Sea, and the marine life it supports, have a long term economic value for future generations?</p>	<p>An EIS is a reference document that must be used by agency decision makers in making final decisions on a proposal, taking into account the general welfare, social, economic, and other considerations.</p> <p>The Draft EIS analyzes direct, indirect, and cumulative impacts of</p>

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			the proposed project on marine and nearshore resources, and the measures being taken to avoid or minimize potential impacts in Sections 7.4 and 7.7. Analysis of the potential direct and indirect impacts of the proposed project considered the duration of construction and project operation, estimated to be 20 years.
Ch11-077	Bret Andrich	There is a need for the products they will produce and this project allows Tesoro to remain viable and competitive.	Thank you for your comment.
Ch11-078	Terry Corrigan	<p>I'm an employee of Haskell Corporation in Bellingham, Washington. And I support this project for a number of reasons. But tonight I'd like to focus on something that hasn't been discussed too much tonight, and that is the benefits this project will bring to workforce development. I've been involved in workforce development for many years. I served on the executive board for the Northwest Workforce Council. I'm also on the Joint Apprenticeship Training Committee for the Plumbers and Pipe Fitters Local 26 here. And I've been involved in tech prep consortiums at the local high schools. Our workforce, especially skilled trades, is kind of facing a demographic tipping point. The numbers of retiring skilled workers in all trades, but especially building and construction trades, is happening at a rapid rate -- more rapid than the influx of young people. And all the trades are doing something about it. They're promoting the trades in schools. They're advertising about it, you know, offering it as an option to a baccalaureate because most high schools just promote baccalaureate and, I think, to the detriment to a lot of trade -- trade groups. A project like this would be extremely beneficial and is extremely beneficial, especially -- not only large projects like this, but the ongoing [unintelligible] and turnaround work at all the refineries -- it provides a venue for training. And all apprenticeship programs are 90 percent on-the-job training. And without a venue to train these guys -- young people -- and gals, you know, they're just not going to learn the trade. It's -- most apprenticeships are five years, then it's another five years to perfect their skills. So, a project like this is really beneficial to on-the-job training and workforce development.</p>	Thank you for your comment.

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Ch11-079	Gordon Zurn	The benefits include many local construction jobs, as well as a significant number of new permanent refinery jobs. The union jobs alone is thought to drive an economy multiplier of 10.	Thank you for your comment.
Ch11-080	Andy Mayer	During construction and long-term, the economic impact of the project on our region will be quite positive in terms of creating new high-paying jobs which will support our families.	Thank you for your comment.
Ch11-081	Alice Lockhart	The agricultural and other local jobs [unintelligible] from new fossil fuel infrastructure here and elsewhere will far outweigh the few jobs that this project will bring to Skagit County, specifically the xylene part. Finally, making me believe that the new renewable sector can't supply jobs as good as refinery jobs -- this is false. Right now there are fewer than a million coal, oil, and gas jobs in this nation and over three million new green sector jobs. We just need more of them in Washington.	Thank you for your comment.
Ch11-082	Chuck Hoover	Locally, it provides numerous construction and permanent family wage jobs; provides an increase in taxes for the city and the county. And the refineries already provide a lot of tax money for the cities and county.	Thank you for your comment.
Ch11-083	Chuck Hoover	And it also helps to secure the long-term viability of the refineries. Nationally, the project will export value-added material -- xylene, in this case -- which help reduce our balance of payments [unintelligible] countries.	Thank you for your comment.
Ch11-084	Bruce H Gillett	I've got 22 years at that plant in the Tesoro refinery, and I'm a recent retiree. I support the project due to the family wage jobs it will bring to the area. That is something that is very hard to come by these days. Despite what some of our politicians may say, these are real. In addition to that, it provides flexibility for the refinery going forward -- for their ability to compete and prosper in the years ahead. It provides additional revenues for the community.	Thank you for your comment.
Ch11-085	Bruce H Gillett	Let's remember that Tesoro is a major economic driver for Skagit County.	Thank you for your comment.

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Ch11-086	Martha Hall	<p>I was born in the Puget Sound area and have lived in Anacortes since 1998. As a native of the area, I cannot stress how important the Salish Sea is to many of us.</p> <p>My family fished for salmon recreationally. We always came home with our limit.</p> <p>Bottom fish were plentiful. So were orcas which we often saw while fishing. I no longer enjoy fishing but I still love the Salish Sea. We have a view of Guemes Channel from our house. I am a citizen scientist, observing herons foraging in this Channel.</p> <p>The Salish Sea provides not only far more jobs than the two refineries in Anacortes ever will.</p>	Thank you for your comment.
Ch11-087	Martha Hall	<p>Compared to the value of these valuable marine habitats, the 20 new jobs this project would create is insignificant. It would be far wiser to have a vision for Anacortes that is based on jobs that do not pose possible threats to the Salish Sea that surrounds our town.</p> <p>The unique flavor and vitality of Anacortes as well as most of our jobs are based on having healthy marine habitats, not refineries that keep expanding and posing new risks to the Salish Sea. Processing another toxic substance, Xylene, to be shipped through the Salish Sea and on to Asia is not in the best, long-term interest of the Salish Sea.</p> <p>I hope the county is not short-sighted in thinking that this project will help Anacortes.</p>	Thank you for your comment.
Ch11-088	Edward John McLeod	<p>Anacortes and Skagit County should focus on ways that they can remain a clean, beautiful and accommodating destination for tourism which most often visits the Pacific Northwest for it's unspoiled beauty and natural treasure. Anacortes and Skagit County should also recognize that some if not much of their tourism success is driven by their neighboring San Juan County and the Salish Sea (perhaps the least overpopulated and unfettered archipelago in the U.S. if not North America).</p>	Thank you for your comment.

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Ch11-089	Martha Hammer	I understand that 20 jobs would result from the production of xylene at the Tesoro, Anacortes refinery.	Thank you for your comment.
Ch11-090	Bryce Oxford	<p>There will be 20 new Full-Time local jobs with salaries that are significantly higher than the state and local average.</p> <p>An investment of this magnitude in the Skagit County economy is significant and will have far reaching benefits to a majority of the residents in the area.</p>	Thank you for your comment.
Ch11-091	Warren Tessler	And I think there are things that, you know, I can really support. You know, the issues of more permanent jobs -- well-paying jobs in the community is a good thing. The issues of making the refinery, you know, a more viable entity and assuring its future -- as a good corporate citizen here in Anacortes -- is a good thing.	Thank you for your comment.
Ch11-092	Joanna Schoettler	But the thing is, though, that green jobs are bringing in more people. They are bringing in more good paying jobs.	Thank you for your comment.
Ch11-093	Julia Sutter	I know we need jobs. Jobs is a good thing. Economy is a good thing. But there's lots of economy involved. There's the economy of the marine life, the tourism. If we lose our tourism, that's going to impact the entire Puget Sound; not just this one area that has the Tesoro factor in it.	Thank you for your comment.
Ch11-094	Marylee Chamberlain	Tesoro provides a lot of jobs in this community, and people that live in La Conner have that work in Tesoro.	Thank you for your comment.
Ch11-095	Cathy Schoenberg	It seems to me we should keep the area here absolutely (not almost) pristine and pollution free as it brings many more dollars in the tourism industry .	Thank you for your comment.
Ch11-096	Mike	Is this project going to be built by union contractors?	If approved, construction of the proposed project would be open to bid by union and non-union contractors.
Ch11-097	Will Golding	<p>How would this project increase the economy in Anacortes?</p> <p>How does this project impact outdoor recreation and associated</p>	The Draft EIS discusses impacts to the economy, including those to the recreation sector, in Sections 11.5 and 11.6.

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		businesses in the area?	
Ch11-098	Leonard Hearne	I am very concerned that the gain in jobs for Anacortes verses the risk to the oyster and other aqua-culture employment does not make good sense for the county. One spill and the aquaculture in the area will be destroyed, like the smelt runs of the 1970s.	Thank you for your comment.
Ch11-099	Mike Culley	But they're [Tesoro] truly a great example of providing family wage jobs to many hundreds of local contract employees, while keeping the product in the pipes -- I say, while keeping the product in the pipes.	Thank you for your comment.
Ch11-100	Peregine O'Gormley	Yeah, we need jobs. We all need jobs. But we don't need these jobs. We can create other jobs. We can create solar, renewable, wind jobs -- whatever. We've got lots of resources to create good sustainable jobs for my son -- for my two sons, for my daughter.	Thank you for your comment.
Ch11-101	Whitney Gonzalez	And when it comes to planning for this new project -- this is a project that is going to create a lot of work for people, and these are people that are trained to work safely.	Thank you for your comment.
Ch11-102	Dustin Small	I support the project because the new products produced are already contained in the materials they use at the refinery every day and the diversification of the refinery will bring economic benefits to our community through new jobs and more tax revenue.	Thank you for your comment.
Ch11-103	Jim lombard	<p>seventh: There is inadequate analysis of the long-term effects from a spill to the natural resources and tourism, fishing, and marine recreation economies.</p> <p>Solution: Fully analyze the effects, damage, mitigation, and financial responsibility for a spill of project-related fuel and cargo to tourism, vacation and retirement home revenues, and fisheries. Ferry services should also be included. These impacts can only be partially mitigated and will persist much longer than the duration of any spill.</p>	<p>The Draft EIS analyzes potential impacts of the proposed project resulting from a marine spill and spill response to both natural resources and the economy in Chapters 3 through 13.</p> <p>Section 13.1 of the Draft EIS discusses the requirements of OPA 90 for marine transportation of petroleum-based materials for the proposed project, including responsible parties for spill oil removal and financial damages resulting from spills. As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal</p>

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			(OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations. Additional information on regulatory requirements for spill response and readiness is provided in Section 3.9.4 of this Final EIS.
Ch11-104	Matt Miller	This project will also add jobs at the refinery where many of my friends and neighbors are already employed. These are mostly the types of jobs that do not require an overpriced four year college degree and pay well enough to afford the ever increasing housing prices in Skagit County. The refinery jobs will continue to have a multiplier effect on the economy outside the fence line in the form of tax base, ancillary jobs and charitable/non-profit philanthropy.	Thank you for your comment.
Ch11-105	Sally Stapp-Brigham	How does this increase in tanker traffic effect the tourist trade? Photos of Mt. Baker suffer from tankers anchored in the view.	<p>The Draft EIS discusses potential impacts on recreation, tourism, and aesthetic enjoyment in the following sections:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4.2 • Aesthetics and visual resources – Section 10.5.2 • Tourism and recreation – Section 11.5.2
Ch11-106	Curt Oppel	They [these new facilities] insure the longevity of this important employment and tax revenue for Skagit County and Anacortes.	Thank you for your comment.
Ch11-107	Irene Svete	Part of the region's strong draw for tourists is its natural beauty and wildlife, especially the orcas. The city of Anacortes recently completed its strategic plan for tourism promotion (2016-2021). A spill would undo any efforts to attract more visitor dollars and cause irreparable damage to our sensitive marine habitat.	Thank you for your comment.
Ch11-108	Mary Ratermann	From what I understand, we are willing to produce this toxic substance for 20 new jobs? Is this really an economic benefit for our community, or a windfall for Tesoro? I think we know the answer to this.	Thank you for your comment.
Ch11-109	Kathleen Lorence-Flanagan	3. 20 jobs in Anacortes hardly offsets the risks, especially long term. Likely many more jobs are maintained/created by a healthy Salish Sea.	Thank you for your comment.

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Ch11-110	Glen Bruels	Which brings me back to my initial point — should we be taking this risk just to add a few more jobs and increased profits?	Thank you for your comment.
Ch11-111	Sally Stapp-Brigham	<p>It is impossible to ignore the economic impact the petroleum manufacturing has in Anacortes.</p> <p>A report by the city of Anacortes in 2013 shows that the two refineries provide 12% of jobs in Anacortes and \$109 million (79%) in wages.</p> <p>But what about the internalized costs unaccounted for? The Carbon tax is \$25/metric ton CO₂. Shell Corp. would have to pay \$48 million for the 1.92 million metric tons of CO₂ they emit.</p> <p>By the same token Tesoro would have to pay \$31 million for the 1.2 million tons of CO₂ emitted.</p> <p>Each year 1.5 million people travel to the San Juan Islands for recreation – the San Juan County Visitors’ Bureau estimates that visitors spent \$189 million in 2015. Would travelers be so keen to come here if they knew the extent the refinery was polluting? How can we better use this land?</p>	Thank you for your comment.
Ch11-112	Barbara Aguero	- 20 jobs against the potential environmental risk/hazard does not weigh out in favor of the jobs.	Thank you for your comment.
Ch11-113	Georgianna Morgan	What economic provisions in place to help fisherman, crabbers and marine commercial businesses receive support if sea life is no longer abundant and/or toxic to consume.	<p>Additional information regarding compensation that would be provided to parties harmed by a marine spill is provided in Section 3.7.2 in this Final EIS.</p> <p>The Draft EIS discusses potential impacts to the marine environment, including aquatic life, and employment income in the following sections:</p> <ul style="list-style-type: none"> • Marine and nearshore resources, including aquatic life – Section 7.4 • Employment income, including commercial and other fishers – Section 11.5.2
Ch11-114	Wendy Bartlett	Many people in Washington State rely on the fishing industry	Thank you for your comment.

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		which is also at compromise with the threat of toxic oil spills.	
Ch11-115	Walter Guterbock	The refineries have to keep updating their facilities in order to maintain their economic viability.	Thank you for your comment.
Ch11-116	Patricia Young	After a brief flurry of jobs to expand this facility, chances are the new plant will be highly mechanized and the red herring of “jobs, jobs, jobs” will be as false as the promise of jobs in years past at the infamous Tethes water bottling plant. With automation only a handful of employees would have been needed to oversee the operation, a fact that was not made public until late in the transactions. At present, Anacortes enjoys a thriving tourism industry which employs hundreds of employees who are essential to its success and who cannot be replaced by robo -workers.	Thank you for your comment.
Ch11-117	Steve Garey	THE BENEFITS TO OUR COMMUNITY GO WELL BEYOND THE MANY LOCAL CONSTRUCTION JOBS AND NEW UNION REFINERY JOBS THAT THIS PROJECT REPRESENTS. THE NEW REFINERY JOBS ALONE ARE THOUGHT TO DRIVE AN ECONOMIC MULTIPLIER OF TEN, WHICH MAY RESULT IN AS MANY AS 200 NEW JOBS IN OUR COMMUNITY.	Thank you for your comment.
Ch11-118	Reisner Distributor, Inc., Ted A Reisner	I think it’s great that Tesoro is always looking to the future and if Xylene is going to help make the refinery more profitable and employ more people it’s beneficial to the community.	Thank you for your comment.
Ch11-119	Ellen Winter	My family and my neighbors all rely on the tourist industry in the San Juan Islands and we're very concerned about your project to produce and ship xylene through the San Juan Islands and any kind of a spill in the water here or compromise to the air would delay and keep tourists away which is our main economy. It's the only way most of us make a living	Thank you for your comment.
Ch11-120	Val Veirs	Can you even imagine the economic loss to Anacortes if your decision on this project caused the orcas to disappear from these waters?	Thank you for your comment.

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Ch11-121	Glen Hendrick	It's it should be a protected wildlife preserve and there is so much going on here ecologically that's at stake as well as everybody literally everybody's jobs is based in tourism and we don't need chemicals destroying our environment and destroying our economy out here.	Thank you for your comment.
Ch11-122	Joline Betterndorf	This area's economy depends to a great extent on tourism which in turn relies on a healthy, accessible, unpolluted land and water environment. We are already being undermined by noise pollution which is negatively affecting the tourism industry. Increased air and noise pollution from more sea and land traffic (from additional rail traffic) will further impact this industry. The page 2 proposed twenty additional full time jobs once the expansion is completed will not compensate for the loss or diminishment of this major industry.	Thank you for your comment.
Ch11-123	Esther Lultikhuizen	- Anacortes is the gateway to the beautiful San Juan Islands, an important tourist destination in WA state and Skagit County. Skagit County surely benefits \$\$ from vacationers embarking to the San Juans to experience the beau of nature. Any accident in the the transportation of the refinery's products via ship (or rail) will significantly impact the tourism industry of elsland and Skagit County. It has been my observation that Tesoro Anacortes has a dismal safety record, thus accidents are inevitable.	Thank you for your comment.
Ch11-124	Susan Crampton	Thank you for giving attention to full economic issues that include long term effects.	Thank you for your comment.
Ch11-125	Anna Fahey	We need to help support those in our community with refinery jobs, but not by wrecking the place we all call home. There are better ways forward that will outlast short term failures and compromises.	Thank you for your comment.
Ch11-126	Carolyn Barney, Lyndon Greene	Lastly, my recent foray in the tourist business has provided me with a front row seat to a growing tourist trade in this area, especially in the last three years. This is happening locally as people are coming to Skagit County from many places in the	Thank you for your comment.

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		<p>United States, including the South, Midwest, and also from Canada -- despite an unfavorable exchange rate. Families are coming here from Seattle, Vancouver, British Columbia, San Francisco, etc., and they are spending both time and money here. They come here because of the Salish Sea and the natural beauty we enjoy in Skagit County. Why risk serious damage to this resource that is attracting so many visitors to our area. Also, my suspicion is this surge in tourism and population will provide many more jobs than a Xylene production and export facility on Marsh Point.</p>	
Ch11-127	Rene Vance	<p>The CPUP project will help Tesoro stay competitive by providing another product, xylene, during a time of otherwise declining gasoline sales in Washington. Vehicle efficiencies have improved and ethanol usage and hybrid vehicles have made a dent in gasoline usage. Tesoro has been innovative by trying to produce xylene for non-fuel sales. Product diversity will help the long-term viability of the Anacortes facility in a competitive refining market. The organizations mentioned above, in addition to the local governments and citizens will benefit. In addition to construction work, there will be 20 more full-time good-paying jobs, with those workers contributing to our community as well.</p>	Thank you for your comment.
Ch11-128	Gay Wilmerding	<p>Without healthy marine and terrestrial ecosystems, loss of wildlife threatens recreation and tourism -- two thriving industries without which rural counties would be hard hit.</p>	Thank you for your comment.
Ch11-129	Joe Bucek	<p>Clean water is critical for our residents and the many tourists who come to our region, attracted by our pristine environment.</p>	Thank you for your comment.
Ch11-130	Frances Dodson	<p>Please explain why money is more important than the toxic polluting of our once pristine waters? Already the shellfish industry has been severely impacted by pollution of the greater Puget Sound, and we have had enough of careless exploitation by the fossil fuel industries without accountability.</p>	Thank you for your comment.
Ch11-131	Kenneth Crawbuck	<p>Why do we not care about the impacts to the residents of San Juan County, whose economy will disappear overnight if a spill or</p>	Thank you for your comment.

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		shipping accident were to occur?	
Ch11-132	Michael Downie	I support the project for its environmental and economic benefits, as well as the increase in tax revenue that helps make Anacortes such a great place to live.	Thank you for your comment.
Ch11-133	Jim Petkiewicz	I work in the San Juan Islands 12 weeks per year, bringing with me hundreds of people, spending lots and lots of money. We will choose another venue far away if this petrochemical highway is enacted.	Thank you for your comment.
Ch11-134	Kelly McConnell	These are risks you are asking US to take in return for a handful of local jobs, literally just a few dozen jobs at most. Who would benefit most from these risks? It is most certainly NOT the people who live here.	Thank you for your comment.
Ch11-135	Haifa Iversen	The argument that this will provide economic growth and jobs is unfounded. Yes we need economic growth and good paying, skilled jobs and we can promote alternative energy projects and renewable energy projects which employ more people.	Thank you for your comment.
Ch11-136	Beverly Faxon	We are told that the job gain from the xylene plant would be just 20 permanent jobs. That gain can't possibly stand up against the potential job loss and other economic damage to tourism, agriculture, and maritime industries (including the ferry system) in the event of a xylene spill...Please consider our jobs, safety and environmental quality of life in this EIS as well as the jobs of Tesoro.	Thank you for your comment.
Ch11-137	Anacortes Chamber of Commerce, Stephanie Hamilton	The positive economic impact of this project will be significant to the Anacortes and surrounding communities. In 2016, our Chamber commissioned an economic study to show the economic impact of the local refineries on our community. That report shows a substantial positive local impact for every dollar invested and job created at the refineries.	Thank you for your comment.

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Ch11-138	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Address economic impacts from spills of all project related vessel cargos and propulsion fuels</p> <p>The DEIS's failure to consider the impacts from spill risk of propulsion fuels has implications for the potential impacts to the local economy as well.</p> <p>The DEIS does not address the significant economic impacts that can result from public perception following a spill. The FEIS should address the "beautiful marine environment" brand damage from spills of all project related vessel cargos and propulsion fuels. The damage to tourism, vacation home, and retirement home revenues (employment income and tax receipts) will be impacted far longer than the duration of any spill.</p> <p>The FEIS should include an updated Table 1110: TravelRelated Economic Data with current Dean Runyan Associates data (released in April 2017) for Washington State County Travel Impacts and Visitor Volume (the DEIS Table 1110 uses Dean Runyan Associates data from 2010). This table should also include Whatcom County along with San Juan, Island, Jefferson, and Clallam counties. Whatcom County would also be impacted from project related marine spills and spill response.</p> <p>[Table with County, DEIS Table 11-10 Travel Spending, 2015 (preliminary)Travel Spending (last year's data)]</p> <p>The FEIS should also address both economic and environmental impacts to the San Juan Island National Historical Park from spills of all project related vessel cargos and propulsion fuels (for economic data see 2016 National Park Visitor Spending Effects: Economic Contributions to Local Communities, States, and the Nation, Natural Resource Report NPS/NRSS/EQD/NRR— 2017/1421).</p> <p>Experience from the Exxon Valdez and Deepwater horizon spills, among others, show that oil spills can impact market perceptions of seafood from the spill area, even those species in areas not directly affected by the spill. The State of Alaska had to address market perceptions of all Alaskan seafood during and following the Exxon spill. It is reasonable to assume that shellfish and fish from</p>	<p>The Draft EIS discusses tourism, recreation, and aesthetic enjoyment within the study area, potential impacts on these resources, and measures that would be in place to prevent or minimize impacts to these resources, including within the San Juan Islands National Monument, in the following sections:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4 • Aesthetics and visual resources – Section 10.5 • Economic environment, including tourism and recreation – Sections 11.5.1.6, 11.5.2, and 11.6.2 <p>Additional information regarding potential impacts to cultural resources including to the San Juan Islands National Monument and San Juan Islands National Historic Park is provided in Section 3.8.2 of this Final EIS.</p> <p>The Draft EIS analyzes potential impacts from unplanned events, such as spills, on marine and nearshore resources in Section 7.4.3 and tribal fisheries and aquaculture in Section 11.5.2. Section 3.9.2.1 of this Final EIS analyzes potential impacts of discharges of vessel fuels in the event of a marine spill.</p> <p>Section 11.5.2.4 of the Draft EIS includes analysis of a potential stigma on fish harvested from marine waters in the event of exposure to a marine spill. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). Potential impacts to perception in the event of a marine spill are speculative, difficult to quantify, and are therefore not analyzed in the Draft EIS.</p>

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		<p>all of the Salish Sea could suffer from adverse market perceptions of quality and safety during and after a spill. It can also be an expensive and time consuming process to sample and analyze seafood to ensure it is safe for human consumption. Fisheries that are unaffected but in proximity to the area of a spill might well be closed as a precaution. Once closed, it can take weeks or months to develop adequate data to reopen those fisheries. This all results in economic impacts to the region were not considered in the DEIS but should be included in the FEIS.</p>	
Ch11-139	Skagit Business Alliance, Christina Jennings	<p>On behalf of the Skagit Business Alliance, I would like to express our support for the Tesoro Clean Products Upgrade Project due to the remarkable positive economic benefits it would provide the communities of Skagit County.</p>	Thank you for your comment.
Ch11-140	Skagit Business Alliance, Christina Jennings	<p>The impact that a project of this magnitude will have on the Skagit County economy cannot be understated. The local refineries have been the bedrock of the local economy since they first opened over 60 years ago. The fact that Tesoro is willing to invest over \$400 million dollars in their local facility shows that they are committed to the people and communities of Skagit County.</p> <p>As stated in the DEIS, Tesoro is expected to employ 20 additional full-time workers annually during operation of the proposed project. At the average annual wage of \$121,114, the proposed project would generate \$2.4 million dollars annually in direct employment income, and approximately \$20 million when considering indirect and induced impacts. Over 20 years, the present value of total employment income generated by operations amounts to approximately \$298 million in additional employment income for the state of Washington.</p> <p>The DEIS also correctly points out that construction of the proposed project would temporarily support employment in the local construction, scientific, and technical services, and transportation industries. The project will have an average construction workforce of 190 that would be employed for the 19-month construction period, with each worker earning an average annual salary of \$117,000.</p>	Thank you for your comment.

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		<p>Tesoro's total construction labor outlays are expected to support approximately \$35 million in employment income directly within the construction industries.</p>	
Ch11-141	Evergreen Islands	<ul style="list-style-type: none"> • What are the positive impacts on jobs, economic growth, and local and state tax revenue? • What are the negative impacts on property values, quality of life, attraction of new residents and businesses, and tourism? 	<p>Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.</p>
Ch11-142	Liz Lovelett	<p>Many constituents have expressed protectionism for our refineries to stay competitive and to continue to be economically viable on the long term. Others have expressed deep concern about the longevity of these types of products in the changing landscape of climate change and consumerism.</p> <p>It is your responsibility to balance these concerns if this project moves forward.</p>	<p>Thank you for your comment.</p>
Ch11-143	Judy Hammer	<p>How many first-responder firefighters does Skagit and surrounding counties have to fight an explosion? My research shows that Xylene is extremely flammable, and becomes even more poisonous/toxic once airborne. It took SIX HUNDRED firefighters three days to extinguish a fire generated by a Xylene-production-plant explosion in China in 2015. This same plant had an explosion in 2013 as well. The Chinese townspeople rioted (in a communist county, no less), demanding the plant be shut down. They succeeded. Please see: Chemical & Engineering News, Volume 93, Issue 15, page 10, April 9, 2015. Article title is: "China p-Xylene Plant Explodes for Second Time in Less than Two Years."</p>	<p>The refinery maintains its own firefighting resources in addition to mutual aid agreements with industrial neighbors and other refineries to respond to petroleum fires or explosions. Additional information regarding Tesoro's emergency response planning and coordination with local services is provided in Section 3.7.1 of this Final EIS. The Draft EIS discusses xylene flammability, explosivity, and toxicity and the potential impacts of an unplanned event in the following sections:</p> <ul style="list-style-type: none"> • Human health: Air emissions – Section 9.3.2.1 • Human health: Fires/explosions – Section 9.6.1 • Human health: Toxicity – Section 9.6.2.1 • Existing fire services – Section 11.4.1.2 • Potential impacts to public services, including police, fire, and emergency response – Section 11.4.2 <p>Additional information regarding the agencies responsible for regulating community safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch11-144	Anne Elkins	Are there even enough firefighters in the entire northwest Puget Sound area to deal with an explosion of this magnitude at Tesoro?	The refinery maintains its own firefighting resources in addition to mutual aid agreements with industrial neighbors and other refineries to respond to petroleum fires or explosions. The Draft EIS discusses the availability of fire and emergency response services and potential impacts to emergency responders in the event of an unplanned event in Section 11.4.1.2.
Ch11-145	Will Golding	What impacts will the project have on local water usage, and could this lead to water shortage for the local community member, environments, ground water levels, or even impact salmon runs?	<p>The Draft EIS discusses water use by the proposed project and impacts on freshwater sources and public utilities in the following sections:</p> <ul style="list-style-type: none"> • Proposed project water consumption – Table 8-3 • Surface water – Section 5.3.2 • Groundwater – Section 5.4.2 • Public utilities – Sections 8.4.1.1 and 8.4.2.2 • Marine and nearshore resources, including salmon – Section 7.4
Ch11-146	Joanna Idczak	Why would we accept it here? Are we a “sacrifice zone”? Our heroic and publicly financed firefighters, in case of explosion and fire, would be stretched thin and concentrated in one place. Examine the map. Think of the school children, often downwind. Think of the evacuations that could be required, as in China’s blast zone. Who would help with timely evacuations? Who would be available to help us with another emergency call issue, if needed, while they are over there?	<p>The Draft EIS discusses the potential impacts and emergency response to an unplanned event including explosion or fire, potential impacts to human health and public services, and fire response services, as well as the plans in place to prevent or manage such an event in the following sections:</p> <ul style="list-style-type: none"> • Safety and unplanned event prevention and response programs – Appendix 2-A • Human health – Section 9.6 • Public services – Section 11.4.2 <p>Additional information regarding emergency response planning and coordination with local services is provided in Section 3.7.1 of this Final EIS.</p>
Ch11-147	Bradley Fox	I strongly object to the proposed Tesoro Xylene plant project at Marches Point for the following reasons ...The damage to our roads and way of life during the two year construction with the large quantity of transport truck moving through our city during the same time the new roundabouts are being built.	The proposed project is planned to be completed between 2017 and 2018, pending SEPA review and permitting. Construction is anticipated to take approximately 19 months to complete with peak construction expected to last 3 to 4 months in the middle of this period (see Section 2.7 of the Draft EIS). Potential traffic impacts as a result of construction of the proposed project are

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			<p>described in Section 9.4.2 of the Draft EIS.</p> <p>Additional information regarding agencies responsible for heavy haul permits and for maintenance of the state and county road system is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The WSDOT SR 20 Sharpes Corner roundabout project is currently estimated to begin construction in the summer of 2018 and last through the fall of 2019 (see the project website at: https://www.wsdot.wa.gov/projects/sr20/sharpescornerinterchange/).</p>
Ch11-148	Gay Wilmerding	<p>And one of the things that really concerns me is I left the island at 6:00 last night to go to the hospital with my husband and he had what was a tummy ache and it turned into a burst appendicitis when it was removed this morning it was gangrenous and for medical we don't have a hospital really I mean they call themselves hospital here on Island but the staffing and the equipment aren't always together. You don't have the person to run the machinery. So in real terms we rely on the mainland for any kind of medical care. That requires more than something very simple and if our ferries aren't running and the weather is bad I mean the ferries run more than planes.</p>	<p>Thank you for your comment.</p>
Ch11-149	Sanford Olson	<p>San Juan County, Dependent on Washington State Ferries.</p> <p>The DEIS does not address Project vessel accident and/or spill impacts to the Anacortes/San Juan Islands/Sidney BC ferry service.</p> <p>In 2016, there were 11,879 sailings to and from the Washington State Ferry Terminal in Anacortes. These 11,879 ferry crossings intersected the proposed</p> <p>Project's vessel routes in Guemes Channel and Rosario Strait.</p> <p>A disruption that impacts the Anacortes Ferry Terminal's ferry routes to the San Juan Islands could be devastating even for just a few days. Ferries are the marine highway and primary transportation route for islanders and our visitors. Grocery stores, that receive all their merchandise via ferries, have only approximately 2 1/2 days' worth of food stock. Even a minimal</p>	<p>The Draft EIS discusses marine traffic, including the 170,000 annual ferry transits of the Salish Sea tracked by the Washington State Department of Ecology, and potential impacts of the proposed project on ferry traffic in Section 13.3.2. Proposed project tankships calling at the refinery would require tug escorts and licensed Puget Sound pilots within the study area (see Sections 13.4.1.2 and 2.8.2). The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels, including ferry routes, and navigational hazards. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Ferry operations could be delayed or temporarily halted if a spill</p>

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		disruption for three days could have significant impacts to my ferry dependent county.	were to occur along or near one of Washington State’s ferry routes. Additional information regarding potential impacts to ferry traffic is provided in Section 3.9.1.3 of this Final EIS.
Ch11-150	Joan Poor	The final EIS must allow for mitigation of all impacts to Washington State Ferries, including the risk of disruption in service if there is a spill of any cargos and/or propulsion fuels.	<p>The Draft EIS discusses the potential impacts from unplanned events, including spills, on vessel traffic in the following sections:</p> <ul style="list-style-type: none"> • Vessel traffic, including ferries – Section 13.3.2 • Spill likelihood and response, and summary of impacts of spills on resources including vessel traffic – Section 13.5 • Details about control measures and safety practices to prevent, respond, and clean up spills are discussed in the following sections of the Draft EIS: • Construction site controls and operational site controls – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Vessel safety and waterway management – Section 13.4.1.2 <p>Ferry operations could be delayed or temporarily halted if a spill were to occur along or near one of Washington State’s ferry routes. Additional information regarding potential impacts to ferry traffic in the event of a marine spill is provided in Section 3.9.1.3 of this Final EIS.</p>
Ch11-151	Gay Wilmerding	<p>Ferry delays threaten island food and fuel supplies, in addition to essential visitor arrivals and departures. As a matter of basic health, the local ERD facility is unable to staff hospital equipment on a regular basis. Islanders rely on access to mainland hospitals for essential services and emergency care via ferries, because they operate in worse weather than planes or helicopter medivac alternatives at far lower cost.</p> <p>Island Hospital in Anacortes diagnosed my partner's Saturday morning tummy ache as a perforated appendix midnight Sunday, and found gangrene when removing vestigial organ at six this morning, Monday. Delay in ferry service would have been life</p>	<p>The Draft EIS discusses marine traffic, including the 170,000 annual ferry transits of the Salish Sea tracked by the Washington State Department of Ecology, and potential impacts of the proposed project on ferry traffic in Section 13.3.2. Proposed project tankships calling at the refinery would require tug escorts and licensed Puget Sound pilots within the study area (see Sections 13.4.1.2 and 2.8.2). The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels, including ferry routes, and navigational hazards. Additional information regarding the agencies responsible for regulating tug</p>

ID	Contact	Comment Text	Response
		threatening in this case.	<p>escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Ferry operations could be delayed or temporarily halted if a spill were to occur along or near one of Washington State’s ferry routes. Additional information regarding potential impacts to ferry traffic is provided in Section 3.9.1.3 of this Final EIS.</p>
Ch11-152	Evergreen Islands	<ul style="list-style-type: none"> • In this time of severe drought statewide, will the project consume more water from the Anacortes? 	Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.
Ch11-153	Evergreen Islands	<p>PUBLIC SERVICES & UTILITIES</p> <ul style="list-style-type: none"> • What are the adequacies 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? • What are the adequacies 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? • What are the adequacies 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? • What are the increased demands on public services (police, fire, emergency medical services) and public utilities (water, sewer, electricity) during normal plant operations? 	Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.
Ch11-154	Sandra Chalk	Please also take seriously our treaty obligations with the Native American tribes who depend upon the health of the Salish Sea and Puget Sound for their own community health and well-being.	The Draft EIS discusses treaty rights and marine and nearshore resources. Tribes were invited to provide input on the document. Additional details can be found in the following sections of the Draft EIS:

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Engagement with tribes, agencies, and other interested parties – Section 1.4 • Treaty rights and impacts to fisheries – Sections 11.5.1 and 11.5.2 • Impacts to marine and nearshore resources – Section 7.4 <p>Additional information regarding treaty rights and cultural resources is provided in Section 3.8 of this Final EIS.</p>
Ch11-155	Elena Rumiantseva	I've been to Anacortes with tribal leaders. This is their home. They have the right to fish and lead normal lives there. Water is life, and is not to be exploited.	<p>The Draft EIS discusses treaty rights and tribal fishing. Tribes have been invited to provide input to the Draft EIS. Additional details can be found in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Engagement with tribes, agencies, and other interested parties – Section 1.4 • Treaty rights – Section 11.5.1 • Impacts to tribal fishing – Section 11.5.2 <p>Additional information regarding treaty rights and cultural resources is provided in Section 3.8 of this Final EIS.</p>
Ch11-156	Libby Mills	I support the Swinomish treatise that limit the number of train cars running to the refineries. I do not support the ongoing violations of these tribal agreements.	Thank you for your comment.
Ch11-157	Nancy Hansen	Another issue is what type of weighing has been done between the rights of the tribe to continue to fish for a living in the bay against the rights of the refinery workers to continue working? Facts needed are totals of numbers of people involved, whether both of the parties talked about this before 1958, whether both can exist at the same time and both have their needs for survival met, or whether there is need for one or the other to be removed. It can't be both without major sacrifices on the part of one or both.	The Draft EIS discusses treaty rights in Section 11.5.1.5 and impacts to treaty and traditionally used resources in Section 11.5.2.3. Tribes were invited to provide input to the Draft EIS. For information on engagement with tribes, agencies, and other interested parties, see Section 1.4 of the Draft EIS.
Ch11-158	Will Golding	How does this project impact the local indigenous communities and will the impacts of this project have an effect on the treaty rights of these people?	The Draft EIS discusses treaty and traditionally used resources in Sections 11.5.1.5 and 11.5.2.3. Additional information regarding treaty rights and cultural resources is provided in Section 3.8 of this Final EIS.

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Ch11-159	Bob Zeigler	The proposed project would appear have impacts with some in construction and more in operation and transport with spills on the natural environment and cultural resources (fishery and marine related) and neighboring Swinomish Nation.	The Draft EIS discusses impacts to the natural environment, cultural resources, and treaty and traditionally used resources in Section 11.5.2.3.
Ch11-160	Bob Zeigler	The document said there would be no impact on Tribal or Traditionally Used Resources. Is this an accurate statement? Are there no Swinomish Nation land claims to March Point?	The Draft EIS discusses impacts to treaty and traditionally used resources in Section 11.5.2.3. The Draft EIS states that treaty resources, traditional lifeways, health, and the culture of the Swinomish and other tribes could be affected. Skagit County does not support the Swinomish Indian Tribal Community claim to the March Point region. For additional information, see: https://www.skagitcounty.net/Home/Documents/Press/04-05-2017%20-%20Ltr%20to%20Brian%20Cladoosby%20-%20SITC%20Claim%20to%20March%20Point%20Region.pdf .
Ch11-161	Chelsea Blank	A few things that I think need more attention are...the potential violation -- oh, also the potential violation of the Swinomish tribes [unintelligible].	<p>The Draft EIS discusses treaty rights and environmental justice in the following sections:</p> <ul style="list-style-type: none"> • Treaty and traditionally used resources – Sections 11.5.1.5 and 11.5.2.3 • Environmental justice – Section 11.7 <p>Skagit County does not support the Swinomish Indian Tribal Community claim to the March Point region. For additional information, see:</p> <p>https://www.skagitcounty.net/Home/Documents/Press/04-05-2017%20-%20Ltr%20to%20Brian%20Cladoosby%20-%20SITC%20Claim%20to%20March%20Point%20Region.pdf.</p> <p>Tribes were invited to provide input to the Draft EIS. For information on engagement with tribes, agencies, and other interested parties, see Section 1.4 of the Draft EIS. Additional information regarding notifications of the availability of the Draft EIS is provided in Section 2.1 of this Final EIS.</p>
Ch11-162	AJ Kuntze	I SUPPORT the Swinomish Indian Tribal Community's right to protect it land, people and marine resources and consequently believe any pending litigation regarding the violation of Burlington	Thank you for your comment.

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		Northern's Easement Contract/Agreement with the Tribe must be resolved before this Project moves forward.	
Ch11-163	David Perk	<p>The final Environmental Impact Statement should correct the following omissions from the draft version:</p> <p>Adequately consult with affected treaty tribes (CPUP DEIS Comment of 5/5/17 from Suquamish Tribe, Steve Todd.).</p>	The Draft EIS discusses treaty rights and traditionally used resources, including those of the Squamish Tribe, in Sections 11.5.1.5 and 11.5.2.3. Tribes were invited to provide input to the Draft EIS. For information on engagement with tribes, agencies, and other interested parties, see Section 1.4 of the Draft EIS.
Ch11-164	Joanna Schoettler	Honor the Treaties!	Thank you for your comment.
Ch11-165	Camille Meehan	How are the tribes federal treaty granted fishing rights going to be affected. Treaties are the highest law of the land and must be honored. If not I as a citizen will stand with the local Swinomish and other tribes to stand for their treaty protected rights as sovereign nations.	The Draft EIS discusses impacts to treaty and traditionally used resources in Section 11.5.2.3. Additional information regarding treaty rights and cultural resources is provided in Section 3.8 of this Final EIS.
Ch11-166	Camille Meehan	<p>I ask that your final EIS include the following as well as address any of my comments above:</p> <p>...</p> <ul style="list-style-type: none"> • Additionally, the EIS must discern if the proposal will affect any treaty rights granted to tribes in the state of WA. Tribes are sovereign nations and their treaty rights are federally protected in the Constitution of the United States. The EIS must discern if there will be impact in partnership with the tribes and not without tribal participation. • The EIS must discern whether the proposal will affect any sacred or religious sites linked to federally recognized tribes. This must be done in partnership with the tribes and not only by independent non-tribal member assessment. 	The Draft EIS discusses impacts to treaty and traditionally used resources in Section 11.5.2.3 and cultural resources in Section 12.4. Additional information regarding treaty rights and cultural resources is provided in Section 3.8 of this Final EIS. Tribes were invited to provide input to the Draft EIS. For information on engagement with tribes, agencies, and other interested parties, see Section 1.4 of the Draft EIS. Additional information regarding notifications of the availability of the Draft EIS is provided in Section 2.1 of this Final EIS.
Ch11-167	Bob Zeigler	The document said there would be no impact on Tribal or Traditionally Used Resources. Is this an accurate statement? Are there no Swinomish Nation land claims to March Point?	The Draft EIS discusses treaty rights in Section 11.5.1.5 and does not conclude that there would be no impacts. Tribes were invited to provide input to the Draft EIS. For information on engagement with tribes, agencies, and other interested parties see Section 1.4 of the Draft EIS. Skagit County does not support the Swinomish

ID	Contact	Comment Text	Response
			<p>Indian Tribal Community claim to the March Point region. For additional information, see: https://www.skagitcounty.net/Home/Documents/Press/04-05-2017%20-%20Ltr%20to%20Brian%20Cladoosby%20-%20SITC%20Claim%20to%20March%20Point%20Region.pdf.</p>
Ch11-168	Lydia Sigo	I am member of the Suquamish tribe and a fisherman. This project would endanger my treaty fishing rights and traditional foods.	The Draft EIS discusses treaty and traditionally used resources in Section 11.5.2.3. Additional information regarding treaty rights and cultural resources is provided in Section 3.8 of this Final EIS.
Ch11-169	Mary Ferm	This refinery has already polluted the local First Nation tribe's historical fishing, clamming and mussel-collecting waters. They don't need to ingest even more toxic chemicals.	Thank you for your comment.
Ch11-170	Dianna MacLeod	Our native peoples must be given a strong voice in any resource actions or allocations.	Thank you for your comment.
Ch11-171	Marilyn Boyd	The indigenous tribes should also be consulted, as this is their territory.	Tribes were invited to provide input to the Draft EIS. For information on engagement with tribes, agencies, and other interested parties, see Section 1.4 of the Draft EIS.
Ch11-172	Suquamish Tribe, Steve Todd	<p>Marine Vessel Traffic</p> <p>The following is stated in the DEIS at 11.5.2.3: "The study area is located near tribal fisheries. Impacts could include loss or changes to habitat, loss of fishing gear or changes in water quality that could impact fish. Marine vessel traffic associated with the proposed project would represent an increase of 2.2 percent or less in large marine vessel traffic along the marine transportation route, adding up to five vessels per month within the established shipping lanes dedicated to shipping activity in the area (see Chapter 13, Marine Transportation, Table 13.9). Depending on the degree of these impacts, treaty resources, traditional lifeways, health, and the culture of the Swinomish and other tribes could be affected due to degradation of their fisheries. Skagit County respects the rights of tribal sovereigns to engage on their terms with local, state, and federal governments as appropriate."</p> <p>The DEIS at Table 13-29 indicates "less than significant" impacts to</p>	<p>Please see Section 3.8 of this Final EIS for detailed responses to Suquamish letter comments and other similar tribal letter comments. In response to comments received, additional information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5.</p> <p>Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>

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		<p>tribal fishing in the statement: “There is potential for reductions in tribal fishing due to temporary restrictions on fishing and mortality of finfish or shellfish. Potential impacts include lower than expected wages for a 2 to 3 day catch period.” This statement does not accurately represent the impacts associated with interfering with treaty fishing and underestimates the potential impacts to treaty-reserved fishing.</p> <p>Vessel traffic poses a significant risk and physically interferes with access to tribal fishing grounds and stations and treaty-reserved rights to harvest fish. This vessel traffic has the potential to negatively impact treaty-reserved fishing activities by Suquamish tribal fishers, including access to fishing grounds, damage to fishing gear, collisions with tribal fishing boats, and increased risk of oil and other chemical spills with direct negative impacts to the marine and nearshore environment.</p> <p>Suquamish requests that the vessel traffic assessment inadequacies and associated impacts to tribal fishing be fully addressed in the EIS. More analysis is required to fully quantify the underlying threat that vessel traffic can impose on treaty access, habitat, and treaty-reserved resources that are vital to tribal fishing communities.</p>	
Ch11-173	Tulalip Tribes, Kurt Nelson	<p>The Tulalip Tribes is the political successor in interest to certain tribes, bands, and groups of Indians who were parties to the Treaty of Point Elliott of January 22, 1855 (12 Stat. 927). United States v. Washington, 459 F. Supp. 1020, 1039 (W.D.Wash. 1978). The Tribes are federally recognized with its community and tribal government located on the Tulalip Indian Reservation in Snohomish County, Washington.</p> <p>The Tulalip Tribes depend upon salmon and shellfish for economic and cultural sustainability. The Tribes reserved the right to take fish in their Usual and Accustomed (U&A) fishing places pursuant to the Treaty. These usual and accustomed treaty-fishing areas include marine areas adjacent to the proposed project and marine waters traversed by vessels that ship product to and from the facility. The right to take fish includes the right to habitat protection to support continuation and enhancement of fish runs.</p>	Thank you for your comment.

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		United States v. Washington, (W.D. WA 2007) WL 2437166. The Tulalip Tribes co-manages fisheries harvest, habitat protection, and restoration efforts jointly with the federal government and the State of Washington.	
Ch11-174	Tulalip Tribes, Kurt Nelson	The DEIS fails to adequately assess project-specific and cumulative impacts to treaty fishing and treaty reserved resources of the affected tribes. This project should not be approved until those impacts are fully described and addressed.	<p>The analysis of impacts to treaty rights and tribal fisheries in the Draft EIS considers publicly available information, and components of the proposed project. Tribes were invited to provide information to the EIS scoping process and the Draft EIS. See Section 1.4.4 of the Draft EIS for more information.</p> <p>Please see Section 3.8 of this Final EIS for detailed responses to Tulalip letter comments and other similar tribal letter comments. In response to comments received, additional information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5 and cumulative impacts to tribal fisheries is provided in Section 3.8.1.6 of this Final EIS.</p>
Ch11-175	Swinomish Indian Tribal Community, Larry Wasserman	<p>1. Swinomish Tribal Interests Protected Under SEP A.</p> <p>As you know, the Swinomish Indian Tribal Community has depended on the natural resources of the Salish Sea since time immemorial. A large number of existing and proposed Canadian and Washington fossil fuel transportation operations and projects threaten unacceptable interference with Swinomish reserved treaty fishing, hunting, and gathering rights. Today's Tribal members consider it a sacred cultural duty and responsibility to protect the Salish Sea for generations yet to come.</p> <p>Adverse impacts to harvesting finfish and shellfish have what federal and state agencies term an "environmental justice" component for the Tribe and its members. The Swinomish Reservation is located less than two miles from the Tesoro Refinery. Swinomish fishers regularly fish in their Usual & Accustomed fishing areas at March Point and waters to the west, north and east, harvesting salmon, halibut, crab, shrimp and other species. The Tribe retains hunting, fishing and gathering rights throughout the Northern Puget Sound area. As the county has</p>	<p>Detailed responses to Swinomish letter comments and other similar tribal letter comments are provided in Section 3.8 of this Final EIS. In response to comments received, additional information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p> <p>Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>

ID	Contact	Comment Text	Response
		<p>noted in the DEIS:</p> <p>The study area is within the usual and accustomed lands of the Swinomish Tribe, which means the tribe manages tribal access to and use of resources. The portion of the study area including the marine vessel transportation route is also within the usual and accustomed lands of several tribes.</p> <p>DEIS at 11-22- 11-23.</p> <p>Our review indicates that this Xylene project's vessel traffic will have a probable significant adverse impact on natural resources important to tribal fishing. Impacts to Tribal fishing are not merely economic; fishing is integral to the Tribe's cultural and spiritual practices. Fishing supports a large number of tribal families and is properly termed "subsistence fishing." It also represents the continuing tribal practices of Swinomish culture, extending back for thousands of years.</p>	
Ch11-176	Swinomish Indian Tribal Community, Larry Wasserman	<p>3. Major Inadequacies in the DEIS.</p> <p>We have reviewed the proposal and draft EIS. The DEIS seems to exclude analysis of the high risk areas to the Swinomish Indian Tribal Community. Impacts to the tribe related to vessel traffic in our treaty reserved fishing areas, impacts to air quality on our reservation, and impacts to our cultural resources on March Point are all virtually excluded from any detailed analysis of impacts.</p>	Please see Section 3.8 of this Final EIS for detailed responses to Swinomish letter comments and other similar tribal letter comments.
Ch11-177	Tesoro Anacortes Refinery, Rebecca Spurling	<p>Tesoro submits this letter, to assist Skagit County in clarifying the analysis of impacts from the CPUP, particularly in the following areas:</p> <p>The FE IS should clarify that the CPUP will not impact Tribal resources and activities.</p>	Thank you for your comment.
Ch11-178	Tesoro Anacortes Refinery, Rebecca Spurling	<p>K. The FEIS Should Clarify that the CPUP Will Not Impact Tribal Resources and Activities.</p> <p>Tesoro supports the County's assessment that the project would not contribute to cumulative impacts on tribal resources and activities in the vicinity of the project in section 11.8. However, we</p>	Information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5 and cumulative impacts to tribal fisheries is provided in Section 3.8.1.6 of this Final EIS.

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		<p>request that the County advance its analysis of potential project impacts on tribal resources and activities in section 11.5.2.3. As currently drafted that section is incomplete and inconsistent with the cumulative impacts analysis in section 11.8 and other pertinent parts of the DE IS. As described in further detail below, the County has analyzed impacts and reached conclusions in other sections of the DEIS that are directly relevant to its analysis of impacts on tribal activities and resources. The robust analysis in these other sections of the DE IS supports a more direct conclusion in section 11.5 that the proposed project will not impact tribal resources and activities.</p> <p>We support the County's work in section 11.5.1.5 to characterize and catalog tribal resources and activities in the vicinity of the project based on available information. Despite that effort, section 11.5.2.3 of the DE IS stops short of assessing project impacts on those resources and activities. Instead, the County nominally defers any conclusion about potential impacts because of the purported lack of information on gathering areas, hunting areas, plants and terrestrial animals important to the Tribes, and tribal fisheries. We are requesting that the County advance its analysis in two ways.</p> <p>First, as a fundamental matter, if the County has not identified specific tribal areas or activities occurring in the vicinity of the project based on its review of available information, it should conclude that there is no impact. Indeed, that is the approach the County has taken in its cumulative impacts analysis in section 11.8, in which the DEIS concludes the following:</p> <p>The proposed project would not disturb any known Traditional Cultural Properties or Cultural Landscapes; specific gathering areas or plants important to tribes, or specific hunting areas or certain terrestrial animals important to tribes; therefore, the proposed project would not contribute to cumulative impacts on these resources.</p> <p>The County should incorporate the same conclusion in section 11.5.2.3.</p> <p>Second, we encourage the County to rely on its assessment of</p>	

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		<p>potential impacts to other elements of the environment to support a conclusion that there are no impacts to related tribal activities and resources (known or unknown). Tribal activities and resources are directly related to broader activities and elements of the environment that the County assesses elsewhere in the DEIS. For example, the County's assessments of potential impacts to marine resources and impacts from vessel traffic or spill are directly relevant to tribal fishing activities. In the specific case of tribal fishing, the DEIS acknowledges this, observing that impacts to tribal fisheries and fishing activities stem from potential project impacts resulting in "loss or changes to habitat" and "changes in water quality that could impact fish." The County has concluded elsewhere in the DEIS that the project will not have those impacts on those other elements of the environment. For the same reasons, the County should therefore similarly conclude there is no impact on related tribal activities and resources. That change would align the County's analysis in section 11.5.2.3 with its assessment of cumulative impacts in section 11.8, in which the DEIS concludes that vessel traffic from the project in conjunction with other vessel traffic "would not significantly reduce waterway access to ... tribal fishers for commercial, subsistence, or ceremonial purposes" and (would not significantly reduce access to marine plants currently gathered as part of tribal aquaculture activities."</p> <p>Advancing its analysis of potential tribal impacts in these two ways would support a conclusion in 11.5.2.3 that the proposed project will not have significant adverse impacts on tribal activities and resources. These recommended changes would also result in a document that is internally consistent.</p>	

Chapter 12: Cultural Resources

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Ch12-001	Sanford Olson	<p>Require the FEIS to address both economic and environmental impacts to the San Juan Island National Historical Monument from spills of all Project related vessel cargos and propulsion fuels</p>	<p>The Draft EIS discusses resources within the Salish Sea that could be impacted by the proposed project, including the San Juan Islands National Monument, in the following sections:</p> <ul style="list-style-type: none"> • Recreation and potential impacts to recreation – Sections 10.4.1 and 10.4.2 • Air quality – Section 4.4.4 • Wildlife and marine resources – Sections 6.4, 6.5, and 7.4 • Economics – Section 11.5.2.4 • Cultural resources – Section 12.4 <p>Additional information regarding potential impacts to cultural resources including the San Juan Islands National Monument and the San Juan Island National Historical Park is provided in Section 3.8.2 of this Final EIS. Additional information regarding potential impacts on environmental and economic resources is provided in Sections 3.3, 3.4, 3.5, and 3.9 of this Final EIS.</p>
Ch12-002	Carl Ullman	<p>6. Cultural resources and impacts. The analysis of cultural resources and impacts is too narrow because it does not address the most important aspects of the region’s culture. That is, the DEIS looks at culture only for “archaeological deposits, historic-era buildings, structures, and objects,” and fails to appreciate, much less examine (i) the region’s particular natural beauty and related values, (ii) the culture of a population drawn to live here partly because of those values, (iii) the culture of a population that repeatedly expresses a strong desire to protect those values, and (iv) the short- and long-term impacts of compromising those values.</p> <p>People here think of the region as, for lack of a better phrase, a special place. But the DEIS does not even attempt to appreciate the special values of the area. Instead, it simply applies wooden-edged rules about what is “cultural” in some historical sense – the same approach that would be taken evaluating a project in a highly industrialized location with a culture quite different in relevant</p>	<p>Thank you for your comment.</p>

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		<p>ways from the culture of the Salish Sea.</p> <p>In short, the DEIS should approach this part of its task by acknowledging the special local values that can be impacted by the proposed action and in that light evaluating this proposal as one of the several proposals for the significant industrialization of the Salish Sea region. Arguably, THAT is where the true impact on the human environment lies.</p>	
Ch12-003	Suquamish Tribe, Steve Todd	<p>The Suquamish Tribe is a signatory to the 1855 Treaty of Point Elliot and has adjudicated usual and accustomed fishing grounds and stations (U&A) in the area of the proposed project. The Suquamish Tribe’s primary concerns with the Draft Environmental Impact Statement (DEIS) for this project are as follows:</p> <p>Treaty Fishing Rights</p> <p>In Section 12.3.1.3. Historical Background, the DEIS fails to acknowledge the Suquamish Tribe (Suquamish) in the list of tribes that have U&A in the study area and therefore, misrepresents and minimizes the impacts to treaty-reserved rights arising from this project. The Tribe has not engaged in consultation with the applicant concerning the DEIS and has not been provided an opportunity to raise its concerns with respect to impacts to treaty fishing, especially given the Tribe was omitted from the list of tribes with U&A in the project area.</p>	<p>Impacts to treaty rights are discussed in Chapter 11, Table 11-1 of the Draft EIS.</p> <p>The Draft EIS lists signatories of the Point Elliott Treaty, including the Suquamish, in Table 11-1. Impacts to treaty and traditionally used resources, including fisheries, are analyzed in Section 11.5.2.3 of the Draft EIS. Additional information is provided on Point Elliott Treaty signatories and treaty rights in Section 3.8 of this Final EIS.</p> <p>Tribes were invited to provide information to the EIS scoping process and the Draft EIS. See Section 1.4.4 of the Draft EIS for more information.</p>
Ch12-004	Suquamish Tribe, Steve Todd	<p>Cultural Resources</p> <p>Table 12-4 summarizing potential impacts to cultural resources is misleading regarding traditional cultural properties (TCPs) and cultural landscapes. There are TCPs and cultural landscapes that are not identified in the DEIS. Therefore this table indicating “less than significant” impacts from marine spills is not correct. Marine spills probably would affect offshore landscapes associated with fishing and marine resource acquisition activities.</p> <p>Suquamish supports the Swinomish Indian Tribal Community and other treaty tribes' DEIS comments for the Tesoro CPUP project that the DEIS fails to adequately assess project-specific and cumulative impacts to treaty fishing and cultural resources of</p>	<p>The analysis of impacts to cultural resources in the Draft EIS considers publicly available information, and components of the proposed project, including marine vessel traffic and potential impacts from marine spills. Tribes were invited to provide information to the EIS scoping process and the Draft EIS. See Section 1.4.4 of the Draft EIS for more information.</p> <p>Additional information related to Suquamish letter comments and other similar tribal letter comments is provided in Section 3.8 of this Final EIS. In response to comments received, additional information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5 and cumulative</p>

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		<p>affected tribes, and that these inadequacies may significantly and irreparably affect treaty-reserved resources and rights, aquatic habitat, and cultural resources.</p>	<p>impacts to tribal fisheries is provided in Section 3.8.1.6 of this Final EIS.</p>
Ch12-005	Swinomish Indian Tribal Community	<p>II. Xylene Project Impacts to Archeological and Cultural Resources The Tribal Historic Preservation Officer (THPO) for the Swinomish Indian Tribal Community has reviewed the archaeological inventory report, attached as an appendix to the DEIS. The report is entitled: Tesoro Anacortes Clean Products Upgrade Project Archaeological Resources Technical Memorandum (NWS-2015-197) written by Robin McClintock and David Sheldon of CH2M dated March 30, 2016 (hereinafter Technical Memorandum). The THPO is the tribal expert on archeological and cultural resources, and is the tribal counterpart to the State Historic Preservation Officer (SHPO). The following comments in this section were authored by James Harrison, Swinomish Deputy Tribal Historic Preservation Officer.</p> <p>The archaeological methodology employed by CH2M is inadequate for the identification of archaeological resources within the proposed project footprint. Six short (~10 ft.) trenches were used to investigate the potential presence of archaeological resources in the area of the three new proposed chemical plant tanks. McClintock and Sheldon (2016) states that, “the geotechnical borings located within the New Tanks Area (Figure 4) suggest that there is 5 to 7 feet of fill overlaying native soils (page 9).” The test trenches reached a maximum depth of 8–9 foot, but due to safety concerns the investigators were only able to enter and examine trenches up to 3 feet deep. Therefore, based on the overburden they were minimally able to examine the native landform buried underneath the industrial fill. The “sample screening” of mechanically excavated sediments from the bottom of the trenches is an inadequate sampling protocol for the project. The volume of the screened sample is not described.</p> <p>Overall, the methodology of the archaeological inventory project is not adequate to determine the presence or absence of unrecorded archaeological resources within the proposed project area. Only a small portion of the project footprint was examined (see figure 2)</p>	<p>Proposed measures for additional geomorphological and archaeological investigation of the New Tanks Area have been added to Chapter 4 of this Final EIS. A refined archaeological monitoring protocol has been developed based on feedback received on the Draft EIS. Additional information regarding the protocol for archaeological monitoring in the New Tanks Area during construction is provided in Section 3.8.1.2 of this Final EIS. If cultural materials are identified, an ethnohistoric overview will be included in the report. Additional information related to Swinomish letter comments and other similar tribal letter comments is provided in Section 3.8 of this Final EIS.</p>

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		<p>and even in these areas it is very difficult to determine the presence or absence of pre-contact resources visually in the bottom of an 8-foot-deep test trench or even by conducting potentially limited sample screening of the spoils. The Tribe recommends that the archaeological inventory be redone using a more effective and adequate methodology, and one guided by the knowledge that the area was a heavily used camas gathering prairie, a longstanding activity with specific and well documented feature types.</p> <p>Furthermore, the Ethnographic Overview section included in this report is remarkable in its lack of detail. It does not mention the presence of tribes in the area, and instead uses extremely broad, non-specific classifications of ethnic association for the site, stating The March Point area has been placed within the traditional lands of the Central Coast Salish, specifically that of the Northern Straits speakers, who occupied the lands from Vancouver Island on the north to Deception Pass on the south.</p> <p>Technical Memorandum at 3. This use of linguistic classifications, rather than the well documented ethnohistorical information regarding the area is disrespectful to the Tribe and inaccurate. This historical revisionist material has the effect of essentially writing the tribes and bands, including the tribes and bands to which the Swinomish Indian Tribal Community is a successor, out of history. This is completely unacceptable to the Tribe. Overall the authors use a broad paintbrush to gloss over and generalize Native history, but describe the Euro-American occupation of March Point with great specificity and detail. Several different European settlers and their biographies are included. In fact, the one and only mention of Swinomish is in the context of a Tribal member's marriage to one of the settlers. Technical Memorandum at 7. This opaque reference only hints at the long-term Tribal occupation of March Point prior to Euro-American appropriation.</p> <p>There was, in fact, an important Swinomish village located on March Point only approximately 0.6 miles from the project area. The project area itself was a well-known camas gathering prairie and later was used to plant potatoes. All of this historical information is readily available in both primary and secondary</p>	

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		<p>historical sources. Its omission renders the archaeological report (and EIS) inaccurate and incomplete.</p> <p>The Tribe recommends that the county conduct further historic and ethno-historic research and revise the memorandum to include this new information. In light of the Tribe’s longstanding occupation of the project area, this area should be documented as a Swinomish Indian Tribal Community-associated Traditional Cultural Property and that documentation should be included in the report as well.</p>	
Ch12-006	Evergreen Islands	<ul style="list-style-type: none"> • What are the impacts to archaeological resources, historic buildings, or tribal concerns? 	Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.

Chapter 13: Marine Transportation

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Ch13-001	Tulalip Tribes, Kurt Nelson	<p>The DEIS fails to acknowledge the project and vessel traffic fall within the Tulalip Tribes U&A and therefore under-represents impacts to Treaty reserved rights. Future marine vessel traffic in the Salish Sea is expected to increase. The future increase could potentially result in cumulative impacts on commercial and tribal fisheries, primarily through reductions in access to fishing areas. The proposed project's 60 vessel increase in vessel traffic in addition to the 2700 or more vessels a year, cumulatively reduces waterway access to commercial fishers or to tribal fishers for commercial, subsistence, or ceremonial purposes.</p>	<p>The Draft EIS discusses increased vessel traffic in Section 13.3. Cumulative impacts from marine transportation are discussed in Section 13.6.</p> <p>The Draft EIS discusses impacts to treaty and traditionally used resources in Section 11.5.2.3. Additional information regarding treaty rights and cultural resources is provided in Section 3.8 of this Final EIS.</p> <p>The existing habitat and species present in the bays near the refinery are described in detail in Section 7.3 of the Draft EIS. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record in Section 13.5.6. Potential impacts from marine spills to fishes inhabiting the nearby bays and tribal fisheries are discussed in Sections 7.4.3 and 11.5.1.5.</p>
Ch13-002	Polly Freeman	<p>Current vessel traffic is already too much for orcas and spill risk. No increase in current vessel traffic.</p>	<p>Thank you for your comment.</p>
Ch13-003	Gary McCabe	<p>We don't need more ships and even more chance of this [spills and toxic releases].</p>	<p>Thank you for your comment.</p>
Ch13-004	Mark Greenberg	<p>I urge you NOT to approve the expansion of the facility to produce this new product. We need to carefully protect and steward our local environmental health and producing XYLENE is risky as is the introduction of more tankers into our waters.</p>	<p>Thank you for your comment.</p>
Ch13-005	Anne Cox	<p>Look at oil spills, train derailments, boats going aground. Accidents happen and my opinion is not to focus on optimism but to prepare for the likely accidents. Waterway accidents, utilities, gas and diesel services all can happen and the report acts as if nothing will happen and there is no need to be concerned about anything.</p>	<p>The Draft EIS discusses the potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire, explosions, and spills to land and the marine environment, and impacts from geologic hazards (earthquakes, tsunamis, volcanic eruption, and landslides). The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7, including an evaluation of the magnitude, geographic</p>

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			<p>extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B of the Draft EIS and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant. The Draft EIS also analyzed the adequacy of the plans and procedures in place to prevent and respond to unplanned events.</p> <p>The potential impacts from unplanned events are discussed in Chapters 3 through 13 of the Draft EIS.</p>
Ch13-006	Judith Green	They want to do upgrades to the facility, but they still want to be shipping stuff through the waters of Puget Sound. I think it's dangerous.	<p>The Draft EIS discussed the shipping of xylene and additional reformate in the marine environment in Chapter 13. The likelihood and potential impacts associated with a spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS.</p> <p>Vessel traffic and safety in the Salish Sea are discussed in Sections 13.3 and 13.4 of the Draft EIS. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-007	Rocky Votolato	The Tesoro refinery is proposing to build a \$400 million xylene plant that would increase the risk of a chemical spill in the Salish Sea and increase tanker traffic	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety

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			<p>management, preventive measures and inspections, and oil spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The potential impacts if a spill were to occur are discussed in Chapters 3 through 13 of the Draft EIS.</p> <p>The Draft EIS also analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-008	Barbara O'Steen	Your proposal to build a \$400 million xylene plant at Anacortes would increase the risk of a chemical spill in the Salish Sea and increase tanker traffic	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6. Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The potential impacts if a spill were to occur are discussed in</p>

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			<p>Chapters 3 through 13 of the Draft EIS.</p> <p>The Draft EIS also analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-009	Edward John McLeod	The ...marine tankers that are necessary to transport the crude to, and the finished product from the refineries have a long history of catastrophic failures.	<p>Safety improvements and technological advances, such as independent tanks and double hulls, have helped to prevent and reduce the frequency of marine incidents.</p> <p>The Draft EIS analyzed the likelihood of a marine spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>Historical data used to analyze the likelihood of marine incidents and catastrophic (worst-case) spills is presented and discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Historical marine vessel traffic – Sections 13.3.1 and 13.3.2 • Marine casualty and vessel incident data – Section 13.4.1.1 • Spill likelihood – Section 13.5.6 <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-010	Edward John McLeod	As a resident of San Juan County and Planet Earth, I would like to strongly oppose an additional risky and unnecessary refining / manufacturing site which will attract an equally risky and unnecessary influx of smog producing transportation traffic and the inherent potential for disastrous accidents and / or spills.	Thank you for your comment.
Ch13-011	Janet Hedgepath	Traffic in the Salish Sea is already high. More traffic raises the risk of either a large spill or incremental degradation of an important	The Draft EIS analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3. The potential impacts from increased marine vessel traffic and likelihood of spills are

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		resource.	<p>discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine vessel traffic – Section 13.3 • Vessel safety – Section 13.4 • Marine spills and spill response – Section 13.5 • Cumulative impacts from marine transportation – Section 13.6 <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p> <p>The potential impacts from marine vessel traffic and marine spills are discussed in Chapters 3 through 13 of the Draft EIS.</p>
Ch13-012	Dwight Rousu	<p>No to a plant for flammable petrochemicals and the attendant petroleum powered shipping that have a risk of massive damage to the sensitive Salish Sea and all the lifeforms living there. Continuous close oversight, if financed, could help keep the risk low, but the magnitude of the potential damage still is so high that the plant should not be built.</p>	Thank you for your comment.
Ch13-013	Robert Bojorquez	<p>The neighboring Tesoro refinery is proposing to build a \$400 million xylene plant that would increase the risk of a chemical spill in the Salish Sea and increase tanker traffic</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6. The Draft EIS also analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p>

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			<ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – 13.5.7 <p>The potential impacts if a spill were to occur, are discussed in Chapters 3 through 13 of the Draft EIS.</p> <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-014	Maria Magana	This proposal should be denied since the risks associated with its transport is too risky for the health of the Salish Sea.	Thank you for your comment.
Ch13-015	Robert Bojorquez	The neighboring Tesoro refinery is proposing to build a \$400 million xylene plant that would increase the risk of a chemical spill in the Salish Sea and increase tanker traffic	The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.
Ch13-016	Martha Hammer	the increased vessel traffic and associated risks of spills, increase in air pollution and water pollution from producing xylene must be looked at along with the other (rumored) plans the oil and natural gas companies have for increased unrefined fossil fuel shipment from Skagit and Whatcom Counties.	<p>Cumulative impacts from past, present, and reasonably foreseeable future actions on marine transportation, including potential impacts on vessel traffic, vessel safety, and spill likelihood, are discussed in Section 13.6 of the Draft EIS.</p> <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in</p>

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			<p>vessel traffic to increase spill likelihood is discussed in Section 13.5.6.</p> <p>Potential impacts from increased vessel traffic and the proposed project’s potential impacts on air quality, and water quality are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Increase in marine vessel traffic – Section 13.3.2 • Spill likelihood and the potential for increases in vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Air quality, including from refinery operations, vessel operation, and spills – Section 4.4 • Water quality from refinery operations and spills – Sections 5.3, 5.4, and 7.4 <p>The refinery’s existing spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and the USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The proposed project would not include export of crude oil from the Tesoro Anacortes Refinery. Potential environmental impacts associated with export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Ch13-017	Virginia Wolff	I have some familiarity with the waters around Anacortes and March Point and a strong interest in seeing both the natural beauty of the area and the livelihoods of people who depend on the healthy marine environment here to be preserved. I'm concerned that the DEIS for this project diminishes the impact of	The Draft EIS analyzed potential impacts on vessel traffic separately for the Guemes Channel, southern end of the Rosario Strait, and the Strait of Juan de Fuca, see Section 13.3.2.2. The Draft EIS also analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an

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		<p>increased vessel traffic on spill risk as insignificant. It claims that 120 additional tanker and barge trips carrying either reformat or xylene, that this project could generate each year, contribute only a 2.5 per cent increase in vessel traffic through the San Juan Islands and the Salish Sea. I think this is an inadequate determination of risk for several reasons. One, not all the waters in the Salish Sea are created equal. All the traffic this project could generate would travel through the narrow waterways leading to Anacortes and March Point, where you represent -- notably consider -- probably considerably more than a 2.5 percent increase. Guemes Channel itself is subject to significant currents and often windy. Commercial, recreational, and ferry traffic is heavy. Two, it isn't clear that the additional vessels would meet the threshold required in [unintelligible] and pilots the safest way to transport hazardous materials. Three, the shoreline around March Point includes sensitive estuarine and habitat that many species of fish, shellfish, birds, and orcas depend upon. Recovery of both reformat and xylene would be difficult with changing currents and frequent winds, and recovery standards don't exist for either substance. In the summary, the DEIS fails to consider the unique geography around March Point in determining the impact of additional shipping on spill routes. Given the sensitive nature of the shoreline, especially the estuarine reserve, more emphasis is needed on prevention.</p>	<p>evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the supporting analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180). All project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production)</p>

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			<p>evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing or recovering the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>The Draft EIS discusses the spill response measures and capabilities that would be used to protect sensitive marine habitats in the following sections:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels, and for protecting sensitive species is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>

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Ch13-018	Erika Davis	<p>We need less dangerous contaminants not more. Our marine and landbased ecosystems here in the Puget Sound and Straight of Juan de Fuca areas are very sensitive and already stressed due to ship traffic, pollution, climate change, and US Naval activities. Just one accident could prove catastrophic for a great deal of marine life, and consequently for our local economies that rely heavily on fisheries and tourism.</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate and are not bioaccumulative (see Section 13.5.7 of the Draft EIS).</p> <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The Draft EIS analyzed the potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire, explosions, and spills to land and the marine environment, and impacts from geologic hazards (earthquakes, tsunamis, volcanic eruption, and landslides).</p>
Ch13-019	Bill Bowman	<p>And I've seen the various choke points that can occur with vessel</p>	<p>The proposed project’s 60 new vessel calls per year (five per</p>

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		<p>traffic safety and recreational boaters. And combine that with a few other factors, like inclement weather and -- maybe an inexperienced -- due to inexperience, we have final factors that come together to create an accident and thus perhaps an oil spill. Speaking extemporaneously, I noticed that there are 60 new vessel calls per -- per month, exclusive of -- so, this is a question I have for -- regarding the EIS. Are there 60 new vessel calls per month, exclusive of ATB -- articulated tug and barge -- traffic? That's mentioned in Chapter 13, Page 13 and 14. And then also that -- Chapter 13, Page 68 -- there's the B.C. trans-mountain expansion, which implies increased traffic and choke points. And so combine that with Tesoro xylene expansion, you're just looking for another potential problem -- more traffic, more danger.</p>	<p>month) include ATB traffic.</p> <p>Cumulative impacts from past, present, and reasonably foreseeable future actions on marine transportation, including potential impacts on vessel traffic, vessel safety, and spill likelihood, are discussed in Section 13.6 of the Draft EIS. The discussion in Section 13.6 included analysis of the Kinder Morgan project in Canada.</p> <p>The potential impacts resulting from increased marine vessel traffic through the Salish Sea considered the narrower passages through the Guemes Channel and southern end of Rosario Strait. Potential impacts are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Land and shoreline use, recreation, and views – Sections 10.3.2, 10.4.2, and 10.5.2 • Vessel traffic , safety, and spills – Sections 13.3.2, 13.4.2, and 13.5 • Details about control measures and safety practices to prevent, respond, and clean up spills are discussed in the following sections of the Draft EIS: • Vessel safety and waterway management – Section 13.4.1.2 • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response – Appendix 2-A <p>Marine vessel safety and waterway management are administered by the USCG. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding recreational boating and vessel traffic, including potential impacts from a</p>

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			marine spill, is provided in Section 3.9 of this Final EIS.
Ch13-020	Navneal Mangat	The fact that the Tesoro Anacortes plant is right on Padilla Bay with access to the Pacific Ocean's waters makes it an extremely dangerous location.	Thank you for your comment.
Ch13-021	[Name not provided]	I'm very concerned about the project at the Tesoro Xylene project in Anacortes. I believe that the impact on the community in the environment is significant. There is more tanker traffic to sensitive Marine habitat, increasing the risk of toxic spills	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6 of the Draft EIS.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the vessel traffic and spill prevention is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Details about spill response plans, control measures, and safety practices along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Oil spill response – Appendix 2-A • Laws, regulations, and guidance for marine transportation, including response plan requirements – Sections 7.1 and 13.1 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Ch13-022	Bonnie Miller	I worry the project will ... increase vessel traffic and increase the risk of chemical spills.	The proposed project would increase vessel traffic by 60 vessel calls per year. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment,

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			<p>and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the vessel traffic and spill prevention is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>Details about spill response plans, control measures, and safety practices along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Oil spill response – Appendix 2-A • Laws, regulations, and guidance for marine transportation, including response plan requirements – Sections 7.1 and 13.1 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7
Ch13-023	Robyn Hallonquist	I would like the EIS to address the environmental impacts of ... exporting refined products via the Salish Sea and potential oil spills,	<p>The Draft EIS discusses the potential impacts to the environment in the event of a spill in the Salish Sea during transport. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5

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			<ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessels and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS</p>
Ch13-024	James M Strong	<p>(8) In my opinion the addition of one tanker a week to the traffic load in the Salish Sea/Quemes Channel/Port of Anacortes presents a risk that is not zero.</p> <p>However with current navigation regulations, including tug escorts, the risk is certainly reduced to minimum values.</p> <p>(9) While numerous "what ifs" can be stated, I feel that many are severely overstated.</p> <p>It is possible that drunken crews and officers could cause a disaster. It is certain that some terrorist episode could also cause environmental mayhem.</p>	Thank you for your comment.
Ch13-025	Sigrid Asmus	I am thus profoundly concerned about protecting the Northwest Coast, and particularly the Salish Sea, from an inadequate	The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response

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		<p>Environmental Impact Statement that fails to address many major threats that would arise from approval of the Tesoro corporation's proposed major increase in transport of fossil fuels in the Salish Sea area, one historically noted for the danger its strong currents represent to all shipping.</p> <p>Fossil fuels like those proposed to be brought into and processed in the Salish Sea area are vulnerable to spills, leaks, and explosions, and these substances are already known to be essentially impossible to clean up or effectively mitigate. Moreover, the record shows that corporations like Tesoro are unable to show evidence of responsible operation. I ask that the Scagit County board not approve the building or operation of new facilities or the transport of more oil in the Salish Sea and the Northwest Coast. To act without demanding an adequate EIS and requiring full mitigation measures would harm the Northwest Coast, the Salish Sea, and set a dangerous precedent for uncontrolled exploitation of Washington State's fragile coastal environment.</p> <p>Tesoro's plan to produce 15,000 barrels of xylene per day for export to Asia would bring an additional five tankers per month through the Salish Sea. Each additional tanker or barge in the Salish Sea compounds the already crowded shipping traffic and increases the risk of spills of crude oil and other refined products.</p>	<p>measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6 of the Draft EIS. In addition, the spill model that was developed for the Draft EIS includes consideration of the effects of currents on the potential for spills.</p> <p>Details about spill response plans, control measures, and safety practices along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Oil spill response – Appendix 2-A • Laws, regulations, and guidance for marine transportation, including response plan requirements – Sections 7.1 and 13.1 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>The Draft EIS analyzed the potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire, explosion, and spills to land and the marine environment. The</p>

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			<p>potential impacts of unplanned events are described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Spill likelihood and response, and summary of impacts of spills on environmental resources – Section 13.5 • Marine and nearshore resources – Section 7.4.3 • Vessel traffic – Section 13.3.2.3 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating vessel traffic and spill prevention is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-026	Phyllis Dolph	Skagit County should include language in the final EIS that: Requires the highest standards during the transport, refining and shipping of xylene.	Thank you for your comment.
Ch13-027	Michael Devirian	More tank vessel traffic will increase the risk of xylene, reformate and propulsion fuel spills.	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6 of the Draft EIS.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the vessel traffic and spill prevention is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Details about spill response plans, control measures, and safety practices along the</p>

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			<p>marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Oil spill response – Appendix 2-A • Laws, regulations, and guidance for marine transportation, including response plan requirements – Sections 7.1 and 13.1 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Ch13-028	Jim lombard	<p>Fifth: There is no comprehensive vessel spill assessment.</p> <p>Solution: Complete an assessment that includes all reasonably foreseeable future vessel traffic through the Salish Sea including Canadian vessel traffic. Assess the impact of the increased size of ships at both US and Canadian ports.</p>	<p>Cumulative impacts from past, present, and reasonably foreseeable future actions on marine transportation, including potential impacts on vessel traffic, vessel safety, and spill likelihood, are discussed in Section 13.6 of the Draft EIS. The discussion in Section 13.6 includes analysis of the Kinder Morgan project in Canada.</p> <p>Section 2.8.2 of the Draft EIS discusses the maximum size of the ships calling at the wharf, which would be similar in type and size to vessels currently calling at Tesoro. Additional information regarding the vessel types for the proposed project, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-029	Irene Svete	<p>For this project, I have two specific areas of concern. The first is the increase tanker traffic and the potential for spills in the Salish Sea. The Strait of Juan de Fuca is already a heavily trafficked passage; Guemes Channel is narrow. My understanding is that the project would bring an additional five tankers per month (60 per year) through the San Juans and the Salish Sea. This is in addition to 34 more tankers a month proposed as part of the Kinder Morgan Trans Mountain Pipeline expansion. The proposed xylene plant is also close to Padilla Bay, where a spill would wreak havoc.</p>	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions, including the Kinder Morgan project, in Section 13.6.</p> <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>Tankers associated with the Westridge Marine Terminal/Kinder Morgan pipeline expansion project could impact marine vessel traffic for xylene tankers associated with the proposed project</p>

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			<p>near the western portion of the Strait of Juan de Fuca at a point in the Strait of Juan de Fuca that is between the mouth of the Lower Elwha River and Port Angeles and westward (see Table 1-2 in Section 1.7.2.2 of the Draft EIS).</p> <p>Controls that would be in place to prevent or minimize impacts are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including potential impacts from a marine spill, is provided in Section 3.9 of this Final EIS.</p>
Ch13-030	CG Wyatt	1. The additional tankers coming into Fidalgo Bay would increase the likelihood of crude oil and other refined product spills in the Salish Sea.	<p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The Draft EIS analyzed the likelihood of a xylenes or reformat spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The</p>

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			<p>likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5. The potential impacts on vessel traffic and vessel safety from the increase in vessels as a result of the proposed project are discussed in Sections 13.3 and 13.4 and the potential for increases in vessel traffic to increase spill likelihood in Section 13.5.6.</p> <p>The refinery's spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-031	Suzanne Myers	The Salish Sea needs to be kept clear of these HUGE vessels. The potential of a spill along with the fluids produced by these cargo vessels is not wanted or needed in our environment.	Thank you for your comment.
Ch13-032	Suzanne Myers	Adverse weather conditions and damage to the vessels will cause damage to our ecosystem. Our essential ferry system would be disrupted by these vessels and the potential spills or damage to the vessels.	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3. The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel traffic including ferries, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 • Marine birds – Sections 6.4.2 and 6.4.3 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Land and shoreline use, recreation, and visual resources – Sections 10.3.2, 10.4.2, and 10.5.2 <p>Additional information regarding spill modeling, including adverse weather, is provided in Section 3.9.2 of this Final EIS. Additional information regarding potential impacts to the ferry</p>

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			system is provided in Section 3.9.1.3 of this Final EIS.
Ch13-033	Suquamish Tribe, Steve Todd	<p>Suquamish is also concerned about the effects of this increased vessel traffic associated with the proposed project, and the cumulative effects when combined with other existing and future projects that would increase vessel traffic. Indeed the DEIS acknowledges the cumulative effects at ES7.11.6: “(T)he proposed project, when considered with past, present, and reasonably foreseeable future actions, would contribute to cumulative impacts on vessel traffic, vessel safety, and the risk of a marine spill”.</p> <p>The EIS needs to more adequately assess vessel traffic risks, impacts and consequences of catastrophic oil and smaller regular oil spills in relation to impacts to the treaty-reserved rights and resources of Suquamish and all other affected treaty tribes.</p>	<p>The Draft EIS analyzed direct, indirect, and cumulative impacts of marine vessel traffic of the proposed project in Section 13.3.2. The Draft EIS also analyzed the likelihood of a spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill.</p> <p>The likelihood of vessel traffic to increase spill risks is discussed in Section 13.5.6 of the Draft EIS and is further discussed in Section 3.9 of this Final EIS.</p> <p>The Draft EIS discusses treaty and traditionally used resources in Section 11.5.1.5.</p> <p>Detailed responses to Suquamish letter comments and other similar tribal letter comments are provided in Section 3.8 of this Final EIS. In response to comments received, additional information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5 and cumulative impacts to tribal fisheries is provided in Section 3.8.1.6 of this Final EIS.</p>
Ch13-034	Sandy Robson	Require the highest standards during the transport, refining and shipping of xylene	Thank you for your comment.
Ch13-035	Swinomish Indian Tribal Community	<p>H. PUGET SOUND ANCHORAGES - Quick Reference Sheet</p> <p>On behalf of the Captain of the Port, Puget Sound Vessel Traffic Service manages anchor reservations for all anchorages listed below. The Captain of the Port may grant anchorage extensions upon request provided space is available and the vessel operations necessitate the continued use of the anchorage.</p> <p>[Table of general anchorages, abbreviations, number of vessels,</p>	Table 13-7 in Section 13.3.1.3 of the Draft EIS includes the Vendovi Island anchorage area. Vendovi Island is not adjacent to (and would represent a substantial deviation from) the marine vessel transportation route analyzed in this EIS. Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for

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		<p>max stay]</p> <p>Notes:</p> <p>1 The Smith Cove West anchorage grounds will only be allowed during the months of October to March if other suitable anchorages in the Elliott Bay Area (including Yukon Harbor) are not available.</p> <p>2 Commencement Bay anchorage grounds other than the southwesternmost anchorage should be used only if Ruston and Quartermaster Harbor are not available. Additionally, Commencement Bay anchorages are limited to vessels less than 750 ft.</p> <p>3 The Port Gardner anchorage grounds are fouled by a wreck buoy in the center of the anchorage grounds limiting the number of vessels allowed. Only one vessel more than 600 ft or two vessels 600 ft and less will be allowed.</p> <p>4 Puget Sound VTS will generally keep one anchorage available for COTP directed movements (COTP orders, detentions, vessel deficiencies, etc.). A 6th vessel is allowed in Port Angeles' easternmost anchorage only for 1 day when approved by COTP for inspection or other emergent need during good weather.</p> <p>5 Agents and masters should review the Port Townsend Harbor / Indian Island section of the Puget Sound Pilot's General Guidelines for Vessels Transiting Restricted Waterways or Ports before making reservations for Port Townsend anchorage grounds. These guidelines can be found at http://pspilots.org/wp-content/uploads/2013/01/Guidelines-Jan-27-2015.pdf.</p> <p>[Map highlighting Vendovi South, Vendovi East, William Pt, Jack Island South, Jack Island North]</p> <p>EXHIBIT B</p> <p>SWINOMISH INDIAN TRIBAL COMMUNITY</p> <p>IMPACTS OF PROPOSED ANCHORAGE CHANGES ON TRIBAL</p>	<p>regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p>

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		<p>FISHING</p> <p>Report Number: 14UK1021</p> <p>Issue: 01</p> <p>Date: 30 July 2014</p> <p>SWINOMISH INDIAN TRIBAL COMMUNITY</p> <p>IMPACTS OF PROPOSED ANCHORAGE CHANGES ON TRIBAL FISHING</p> <p>Prepared for: Swinomish Indian Tribal Community 11404 Moorage Way La Conner, WA 98257</p> <p>Author(s): Andrew Rawson and Stephen Drew</p> <p>Checked By: Ed Rogers</p> <p>Marine and Risk Consultants Ltd</p> <p>Marico Marine</p> <p>Bramshaw</p> <p>Lyndhurst</p> <p>SO43 7JB</p> <p>Hampshire United Kingdom</p> <p>CONTENTS</p> <p>1 Introduction 1</p> <p>2 Anchorage Use3</p> <p>2.1 Present Day Anchorage Use 3</p> <p>2.2 Future Anchorage Use 7</p> <p>3 Impact Analysis 8</p> <p>3.1 Fishing Disruption..... 8</p> <p>3.2 Risks of Collision With Small Craft 10</p>	

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		<p>While it is not known whether similar restrictions would be placed upon the proposed anchorage areas, it appears that the rule would give the Coast guard greater management authority to exclude smaller vessels and give priority to larger vessels.</p> <p>With larger vessels using the formal anchorages only, and with an increase in bunkering and anchoring due to Gateway Pacific, the opportunities for smaller vessels to anchor and transit in these areas will be greatly reduced. In addition, if the designation leads to greater use by tankers,</p> <p>there are 500-yard security zones around tankers, which will increase the area of exclusion to other vessels. In summary, an upward trend in the use of the Vendovi Anchorage is shown over recent years. While formal designation of the anchorage may not have a strict causal relationship with increase in anchorage and bunkering, it is clear that it will allow improved management and control of the anchorage by the Coast Guard, which could lead to increased use of the anchorages. With increased use, tribal fishing vessels are likely to use the new anchorage areas less for fishing, since gear such as nets and crab pots would be at a greater risk of loss.</p> <p>The justification presented by the US Coast Guard for the implementation of these proposals contains general non-anchorage specific remarks about improving safety. It is therefore not obvious if the codifying of these anchorages is necessary given current vessel activity in Puget Sound and also the possible adverse effects if they were implemented.</p> <p>Anchoring and bunkering can have significant negative impacts upon the activities of smaller vessels including tribal fishermen and recreational users, depending on the amount of anchoring and bunkering and the degree to which these activities occur in fishing grounds and transit routes. These impacts include the risks of oil spills, risks of collision, hindrance to fishing, and loss of gear. Certain areas such as those near Vendovi Island warrant further study since they are important to tribal subsistence and commercial fisheries, and could be most impacted by forecast</p>	

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		<p>increases in vessel traffic. In addition, although smaller vessels are not expressly excluded from the anchorage area, increased use by tankers, bulk carriers, tugs and oil barges in the narrow channels around Vendovi and Guemes Islands traveling to and from the anchorage area, and manoeuvring inside the area, constitute a physical impairment of the tribal fishing area. Tribal fishers are less likely to set nets or crab pots in busy anchorage areas. Additional study of these potential effects on tribal treaty fishing is warranted.</p> <p>In the following report we focus particularly on the implications of the anchorage proposals near to Vendovi Island and the Swinomish Reservation (see Figure 3 and Figure 4). However the impacts will be felt more widely across the Puget Sound and Salish Sea and to other tribal communities, all of whom have rights to fish in usual and accustomed areas under the Stevens Treaties (e.g. the Treaty of Point Elliot, 1855).</p> <p>2 ANCHORAGE USE</p> <p>Before summarizing the impacts that anchorage use can cause for fishermen, it is worth describing the present day and predicted future uses of anchorages in the Puget Sound.</p> <p>2.1 PRESENT DAY ANCHORAGE USE A number of anchorages are already described in 33 CFR 110.230 and the Puget Sound Harbor Safety Plan. Glosten (2014) looked at deep water anchorage use as part of the BP Cherry Point Draft Environmental Impact Statement. They find that the current percentage of the year in which the anchorages are occupied as:</p> <ul style="list-style-type: none"> ? Cherry Point: 3.6%; ? Vendovi: 18%; ? Anacortes: 30%; and ? Port Angeles: 30%. <p>The use of the Vendovi anchorage has increased between Jan 2010 and Dec 2012, with the total number of vessels utilizing the anchorage increasing from 91 in 2010 to 142 in 2012, representing</p>	

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		<p>an increase of 56% (Figure 1). From closer analysis of the Jan 2010 to Dec 2012 data the following statistics for the Vendovi Anchorage can be ascertained:</p> <ul style="list-style-type: none"> ? Petro Tankers accounted for the single greatest type of vessel using the anchorage; ? Tugs show the greatest increase in use of any type of vessel using the anchorage; ? No Bulk Carriers utilized the anchorage; and ? No General Cargo vessels utilized the anchorage. <p>Data shows sporadic bunkering activities at the Vendovi anchorage from 2008 to 2012, however a marked increase is noted in 2013 (see Figure 2 from Aids to Navigation Team - ANT). It is not clear whether this increase in the partial 2013 data is a long-term increase in bunkering activity associated with a specific development or from limited capacity in other anchorages.</p> <p>Vessel traffic data from 2011 for the Vendovi anchorage areas (see Figure 3) shows that:</p> <ul style="list-style-type: none"> ? Much of the anchorage is used, but most vessels anchor to the west, presumably in an attempt to seek a lee from Vendovi Island; and ? There is a significant amount of vessel traffic, particularly tugs and port tenders, passing through the anchorage (mostly on the west side) in a north-south direction. <p>[Figure 1: Anchorage use at Vendovi Island]</p> <p>[Figure 2: Number of bunker operations taking place at Vendovi Anchorage from ANTs database.]</p> <p>[Figure 3: Vessel movements near to Vendovi Island (2011)]</p> <p>[Figure 4: Vessels with a speed of less than 1 knot (2011)]</p> <p>2.2 FUTURE ANCHORAGE USE</p> <p>As general economic output increases and if a number of new</p>	

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		<p>proposed facilities become operational, demand for anchorage use will increase significantly in the Puget Sound, both as holding areas and bunkering sites. All of the additional traffic for the Gateway Pacific Terminal is likely to bunker somewhere in the Puget Sound (Glosten 2012), and since bunkering at the Gateway Pacific Terminal dock has been precluded by prior agreement with regulatory agencies, vessels will be required to anchor to take bunkers. Furthermore, additional traffic for BP Cherry Point, Delta Port and Kinder Morgan will also increase demand at the other anchorage locations, which could displace vessels to the Vendovi anchorage due to capacity limitations.</p> <p>Additional vessel traffic will also require additional bunkering support. The Draft Glosten Associates Report estimates that the Gateway Pacific Terminal alone would increase bunkering demand within the Puget Sound by 236% by 2026 (Glosten, 2012). It is also understood that Gateway Pacific vessels will not bunker alongside the GPT dock and therefore all of the increased traffic would necessarily bunker in one of these anchorages – most likely the Vendovi Anchorage. Both the VTRA and GPT traffic studies in the BP Draft EIS (2014) assume this bunkering would take place in the Vendovi Anchorage.</p> <p>In summary, an upward trend in the use of the Vendovi Anchorage is shown over recent years. With several proposals for new terminals, it is evident that the anchorage will be further utilized. While formal designation of the anchorage may not have a strict causal relationship with increase in anchorage and bunkering, it is clear that it will allow improved management and control of the anchorage by the Coast Guard, which could lead to increased use of the anchorages..</p> <p>3 IMPACT ANALYSIS</p> <p>The proposals presented by the U.S. Coast Guard leave some uncertainty as to what the potential impacts would be if implemented. Two possible scenarios could be identified:</p> <p>? Firstly, designating the anchorages could result in an increase in</p>	

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		<p>vessel traffic directed to these new anchorages thereby increasing the number of vessel transits and bunkering actions near to the Swinomish Reservation and within the Tribe's Usual and Accustomed fishing areas; or</p> <p>? Secondly, the U.S. Coast Guard restricts the anchorage use for the largest commercial vessels, displacing smaller vessels to other less suitable anchorages and displacing areas available for tribal fishing.</p> <p>It should be noted that the impacts of the scenarios may be exacerbated by increases in vessel traffic within the study area. The combined impacts of general increases in traffic volume, additional traffic related to Gateway Pacific Terminal, Transmountain Pipeline Expansion (Kinder Morgan) and Delta Port will increase both the fishing safety risk and physical disruption that tribal fishermen will face. Any proposal to change the status of anchorages needs to study and properly account for this additional traffic, with consideration of risks that greater vessel movements may pose to Puget Sound tribes and other stakeholders.</p> <p>The Puget Sound anchorages are sited in important fishing areas. In particular the Vendovi, Cherry Point, Bellingham Bay and Anacortes regions are regularly fished by small tribal fishing vessels. The areas in and surrounding the Vendovi anchorages are prime areas for harvesting crab, one of the harvests of major importance to the Swinomish Tribe. Marico has therefore identified four impacts that the proposed anchorage changes would have upon the Swinomish and other tribal fishermen.</p> <p>3.1 FISHING DISRUPTION</p> <p>The Swinomish, along with other signatories of the Point Elliott Treaty (1855), hold the right of taking fish, at all usual and accustomed grounds and stations (Article 5). Increased use of these anchorages and increased traffic of commercial vessels, tugs and bunker barges would, to a greater or lesser extent, deny the Swinomish tribe fishing access to these areas. A transiting vessel</p>	

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		<p>poses both an obstacle and a safety risk to fishermen, especially those fishermen with cumbersome gear that limits maneuverability. Furthermore, Homeland Security Exclusion Zones force fishermen to stay well clear of tankers, limiting their fishing grounds further. Estimates made as part of the Draft Glosten Associates Report on Gateway Pacific Terminal Vessel Traffic suggests that without any developments by 2026, increased disruption to Lummi fishermen alone would be 37% in Saddlebag/Guemes and 3% in Juan de Fuca East (Glosten, 2013). We note that there are several limitations in the approach employed by Glosten Associates including the assumptions made, the focus on Lummi fishermen only, and the exclusion of the impacts of other developments and therefore these figures are likely to be underestimations.</p> <p>The Regulations contained in 33 CFR 110.230 state that “(13) Fishing and navigation by pleasure and commercial craft are prohibited within the area at all times when vessels which are anchored in the area for the purpose of loading or unloading explosives display a red flag by day and a red light by night, unless special permission is granted by the Captain of the Port.” By only specifying restrictions in an explosive anchorage we interpret that there are none in a General Anchorage. It is neither clear how large the defined exclusion area would be nor what proportion of the time vessels load/unload explosive material. Clarification is therefore sought before comment can be given.</p> <p>[Figure 5: Schematic of a 250m tanker at anchor in Vendovi anchorage.]</p> <p>Increased anchorage use has environmental implications in fragile ecologies. Anchors and anchor chain (see Figure 5) cause scarring to the seafloor that can damage or destroy important habitats, particularly grasses that support local food chains, and therefore the resources the Swinomish fishermen rely upon (anchoring exclusion zones are often prohibited in areas of sea grass in the United States, United Kingdom and Australia). The footprint affected is likely to be much larger than the anchor itself, but to</p>	

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		<p>include a circular area where the anchor chain drags across the seabed as the vessel swings with changing wind and current (see Figure 4 and Figure 5). Areas of as much as 1140 meters in diameter could be removed from available tribal fishing grounds.</p> <p>3.2 RISKS OF COLLISION WITH SMALL CRAFT</p> <p>Increased movements by commercial vessels, tugs, pilots and bunker barges between anchorages increase the risk of collision with smaller craft. The Puget Sound is home to several hundred thousand recreational craft and hundreds of small fishing boats who must share restricted waterways with commercial vessel movements. Furthermore, the eastern Puget Sound requires restricted navigation, occasionally in poor visibility, which could contribute to collision situations.</p> <p>The Draft Glosten Associates Report on Gateway Pacific Terminal Vessel Traffic estimates that by 2026 the risk of collision between commercial vessels and Lummi fishermen alone would increase by 14%, and when taking into account the Terminal this figure would be as high as 24% (Glosten, 2013b). If the impacts of other developments and other fishing fleets are included, this figure would likely be far higher.</p> <p>Furthermore any exclusion zones may displace smaller craft from regular routes that could result in a higher risk of collisions or groundings. Excluding recreational craft and fishing vessels from some areas would necessarily concentrate them elsewhere, resulting in a higher density of vessels and therefore a higher risk of collision. It also puts additional stress on fishing resources in the remaining areas.</p> <p>3.3 IMPACTS OF OIL SPILLS</p> <p>A significant risk that large commercial vessel exposure poses to the Puget Sound is that of catastrophic oil spills. In particular, the forecast increases in vessel traffic from cumulative developments have the potential to significantly increase the risks of tankers, cargo vessels and bunker barges being involved in collisions, groundings and allisions. A recent study by George Washington</p>	

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		<p>University estimated an across the board increase of 167% in the potential for oil spills as a result of these new developments (Van Dorp et al. 2014).</p> <p>Major oil spills undoubtedly cause significant damage to the ecosystems in which they occur. Even twenty five years after the Exxon Valdez spill a recent study has estimated that only 13 of the 28 monitored resources have recovered or have “very likely” recovered (Exxon Valdez Oil Spill Trustee Council, 2010).</p> <p>Furthermore, neither commercial fishing, recreation, tourism, nor subsistence fishing has fully recovered to pre-Exxon levels.</p> <p>Decisions regarding the locations and capacity of anchorages need to take into account the associated risks that such decisions may make, especially in reference to increasing vessel traffic. Oil spills can also result from bunkering activities, which would necessarily need to occur more frequently to meet the increasing demand from greater vessel transits. Whilst bunkering spills generally have a lower magnitude of environmental risk than navigation incidents, they occur more frequently and may therefore be a significant risk.</p> <p>The VTRA study found that eliminating bunkering from the Vendovi anchorage was one of the most effective mitigation measures that could be employed to reduce oil spills in the Puget Sound (Van Dorp et al. 2014).</p> <p>3.4 LOSS OF FISHING GEAR</p> <p>Increased vessel movements result in increased loss of pots and other fishing gear (such as nets), and limit the areas where fishermen can safely place their pots without fear of damage.</p> <p>Consultation with Lummi tribal fishermen conducted by Glosten Associates in support of the Gateway Pacific Terminal suggested that each fisherman loses between 40 and 50 pots each year (Glosten, 2013). If the proposed changes to anchorages result in greater vessel movements, the increased vessel transits could result in more pots lost, impacting upon tribal fishermen’s livelihoods. Whilst potting for crabs represents the most valuable form of fishing available for the tribal fishermen, the anchorage area will invariably become uneconomical as an increasing number</p>	

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		<p>of pots may be lost.</p> <p>Damaged gear poses a secondary impact in continuing to kill shell fish, contributing to unsustainable species decline until the pots deteriorate or are removed. The Northwest Straits Initiative estimates that there are more than 12,000 lost crab pots in Puget Sound (Antonelis et al. 2011); each pot could kill up to 30 crabs.</p> <p>4 SUMMARY AND RECOMMENDATIONS</p> <p>Given the impacts described above that vessel activity within the Puget Sound already has upon tribal fishing activity, it is recommended that further study is undertaken to examine the nature and severity of impacts to tribal fishing before any decision is made. The U.S. Coast Guard letter has not provided any context or specific justification for the designation of the new anchorages, nor is there any explicit tie to forecast increases in vessel traffic. Furthermore, a number of other concerns merit investigation, such as the risks of collision with through traffic in a busy anchorage or whether Vendovi is a suitable anchorage for bunkering.</p> <p>Based on this high level study, Marico recommends that the Swinomish Indian Tribal Community seek assurance from the U.S. Coast Guard that:</p> <ul style="list-style-type: none"> ? The U.S. Coast Guard will not seek to introduce restrictions or exclude tribal fishing vessels in the proposed general anchorages; ? The Coast Guard will need to find a solution to the anchorage issue that does not violate tribal treaty fishing rights; ? If regulators plan to provide for anchorage and bunkering of Gateway Pacific Terminal vessels at the Vendovi Anchorage, the U.S. Coast Guard must undertake an independent risk assessment to examine environmental consequences and physical impairment of tribal treaty fishing rights; and ? Any consideration of new anchorage areas will require a structured and formal risk assessment process with detailed government to government consultation with Indian tribes, a thorough examination of environmental impacts, and a 	

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		<p>comprehensive analysis of safety for all classes of vessels.</p> <p>5 REFERENCES</p> <p>Antonelis, K. Huppert, D. Valasquez, D. and June, J. (2011). Dungeness Crab Mortality Due to Lost Traps and a Cost-Benefit Analysis of Trap Removal in Washington State Waters of the Salish Sea. North American Journal of Fisheries Management, 31(5), 880-893.</p> <p>Exxon Valdez Oil Spill Trustee Council (2010). Exxon Valdez Oil Spill Restoration Plan: 2010 Update Injured Resources and Services. Anchorage.</p> <p>Glosten Associates (2012). Draft Gateway Pacific Terminal Vessel Traffic and Risk Assessment Study: Task 9: Bunkering Demand. Rev P0.</p> <p>Glosten Associates (2012). Draft Gateway Pacific Terminal Vessel Traffic and Risk Assessment Study: Task 10: Bunkering Accident Characterization. Rev P0.</p> <p>Glosten Associates (2013a). Draft Gateway Pacific Terminal Vessel Traffic and Risk Assessment Study: Task 13: Traffic Impacts on Tribal Fishing. Rev P0.</p> <p>Glosten Associates (2013b). Draft Gateway Pacific Terminal Vessel Traffic and Risk Assessment Study: Task 14: Risk of Collision with Tribal Vessels. Rev P0.</p> <p>Glosten Associates (2014). BP Cherry Point: Vessel Traffic Analysis, Rev A.</p> <p>van Dorp, J.R. and Merrick, J.R.W. (2014). VTRA 2010 Final Report: Preventing Oil Spills from Large Ships and Barges in Northern Puget Sound & Strait of Juan de Fuca.</p> <p>EXHIBIT C</p> <p>[Vessel Traffic Risk Assessment (VTRA) 2010 - Where does Oil on</p>	

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		<p>Focus Vessels Travel?]</p> <p>EXHIBIT D</p> <p>[Vessel Traffic Risk Assessment (VTRA) 2010 - 12.3% of VTRA 2015 Base Case Total Annual Potential Oil Loss]</p> <p>Puget Sound Vessel Traffic Risk Assessment 2015 Workgroup Meeting notes 01-02 June 2016 1. The Puget Sound Vessel Traffic Risk Assessment 2015 workgroup met on 01-02 June, 2016 at Federal Center South, Seattle. The following people were in attendance:</p> <p>[Table of names, organizations, June 1, June 2]</p> <p>Introductions</p> <p>2. Captain Moreno began the meeting at approximately 1:00pm on June 1st with introductions, and reviewed the status of previous action items.</p> <p>a. Ecology research the DEIS for the Westway terminal, and provide the workgroup a summary of potential projects on the Columbia River. Status: Complete.</p> <p>b. Ecology send CDR Edwards' presentation to the workgroup. Status: Complete.</p> <p>c. Ecology coordinate with John Veentjer to identify and distribute the double hull effectiveness study. Status: Complete, there was not an additional study beyond "The effectiveness of double hulls in reducing vessel-accident oil spillage" paper sent to the workgroup by Fred Felleman on April 11, 2016.</p> <p>d. Ecology coordinate with Jason Merrick and Rene van Dorp to determine if the oil outflow model includes LNG specific designs, for any LNG ships that carry bunker fuel, and whether CENTERM traffic (additional 65 container ships) can be added to the revised definition of Case S. Status: Complete. CENTERM container ships added to Case S (65 calls per year). Rene stated they could model added LNG Tankers in New What-If Cases in the same way as double hull protected Cargo Vessels are modeled in the former</p>	

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		<p>VTRA 2010 model and thus add them to the Cargo Focus Vessel Class. That would account for potential fuel oil losses in case of groundings and collisions involving added LNG tankers, but this would not account for the potential consequence of LNG release during one of these potential accidents.</p> <p>e. Workgroup continue to identify new what-if cases for decision in June, and review the 2010 Risk Mitigation Measures to begin preparing for the July risk mitigation workshop. Status: for discussion during the meeting.</p> <p>f. Ecology verify with Rene and Jason that each 2010 updated what-if case (Q, R, and S) will be re-run individually, in addition to the combined updated case (T). Status: Complete. Rene confirmed they would separate their analyses, including the combined case T as part of the VTRA 2015 update.</p> <p>Modeling and Analysis Updates</p> <p>3. Rene gave a series of presentations on the updated VTRA 2015 project schedule, a comparison of the VTRA 2015 calibration case to the VTRA 2010 base case, comparisons of the updated cases T, R, S, and Q to the VTRA 2015 calibration case, and the VTRA 2015 model calibration process. Following the meetings, Rene posted all presentations to his faculty page:</p> <p>https://www.seas.gwu.edu/~dorprj/VTRA_2015/VTRA_2015_Presentations.html.</p> <p>a. Updated VTRA 2015 project schedule. Rene reviewed the history of the VTRA series of projects, starting in 2005, continuing with the 2010 VTRA funded by the Makah Tribe and Puget Sound Partnership, to the current 2015 VTRA update. Rene showed the revised schedule for the project. Updates to the schedule include the recalibration of the model using accident data from 1990-2015 (complete), delaying the development of the 2015 base case to June 2016, and moving the draft report and final report dates to October and November 2016 respectively. Ecology will work with Rene on capturing the 2015 VTRA preliminary/draft results to use during the Salish Sea Workshop, October 18- 19, 2016.</p>	

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		<p>b. Comparison of the VTRA 2015 calibration case to the VTRA 2010 base case.</p> <p>i. Rene presented the results of recalibrating the model at the accident level. The presentation included a comparison of potential oil loss and potential accident frequency between the 2010 base case and the 2015 calibration case, as well as a by-waterway zone comparison for potential spills in the size categories 2,500m³ or greater; 1,000 – 2,500m³; 1-1,000m³, and 0-1m³. During the discussion, some members were concerned that the risk of potential spills greater than 2,500m³ are not based on historical events of that size, which could skew the public perception of risk. Jason noted the oil outflow amounts are produced using a consequence model, which incorporates ship type, displacement, speed, and interaction angles. The consequence model is based on Transportation Research Board Special Report 259.</p> <p>ii. During the presentation, it was suggested that the Islands Trust waterway zone could more accurately be re-named the Gulf Island zone. Subsequent to the meeting, Meghan Mathieson noted that calling the waterway zone “Southern Gulf Islands” would be a clear and appropriate label. Rene has adopted this label for waterway zone 15.</p> <p>c. Comparisons of updated Case T, R, S, and Q to the VTRA 2015 calibration case. Rene presented the results of comparing the updated Case T to the VTRA 2015 calibration case in detail. In the interest of time, he showed selected results from the comparison of Case R to the VTRA 2015 calibration case.</p> <p>i. Rene was asked about vessel traffic in the calibration case. The 2015 calibration case currently uses 2010 data. Once Rene creates the 2015 base case by rebalancing the 2015 calibration case to match 2015 traffic levels, the results will change. There was some discussion about whether the 2015 base case should retain 2010 vessel traffic, since 2015 saw low traffic compared to the past 25 years. Rene recommended updating the 2015 base case to incorporate the rebalancing; he does not anticipate it will change</p>	

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		<p>the results significantly. There was general consensus by the workgroup to proceed with rebalancing to 2015 traffic levels to create the 2015 base case.</p> <p>ii. Rene noted that he has also added a new method of modeling vessel arrivals. In VTRA 2010, vessels arrived at evenly spaced intervals. For VTRA 2015, Rene is using a “scheduled random” approach, where vessels arrive based on a probability distribution, centered on scheduled arrival days. 90% of vessels will arrive within two days of the scheduled arrival day. Changing the arrival pattern results in small changes to predicted potential outflows, as shown in the presentations.</p> <p>iii. Rene reviewed the 1995-2015 accident data, and showed how the model is calibrated to the running average of collision, allision, and grounding accidents per year for tank and cargo focus vessels, and to the running average of accidents that resulted in a spill greater than 1m3. He described the issue of initialization bias when using a time series of data. Because the data series starts with zero oil spills, it takes time for the running average to accurately reflect the underlying probability of a spill. CAPT Raymond noted that if the model used the past 10 years of data, the average number of spills greater than 1m3 would be zero. Rene and Jason discussed the challenge of needing to have some data to calibrate the model. Because the probability of an oil spill greater than 1m3 is strictly positive (i.e., >0), the only way to calibrate on accidents resulting in an oil spill of that size is to use enough years of data to include such spill events.</p> <p>4. The workgroup briefly discussed new what-if cases before adjourning for the day at 5:00pm.</p> <p>What-If Case Discussion</p> <p>5. The meeting resumed at approximately 8:00am on June 2nd. Captain Moreno discussed the goals and process for deciding on new what-if cases to include in the VTRA 2015 update. The goals were to define the new cumulative what-if case, Case U, and to determine three individual projects or groups of projects to</p>	

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		<p>analyze separately. An iterative process was proposed, consisting of four steps: brainstorming projects and scenarios; deciding which projects to include in the cumulative case; defining vessel numbers, types, routes, and bunkering assumptions; and deciding on the three cases for individual analysis.</p> <p>6. The workgroup began the brainstorming step by discussing whether Gateway Pacific Terminal should be included in Case U, based on the US Army Corps of Engineers decision to halt the permitting process. There was general consensus that the workgroup did not want to use one of the three individual analysis cases to see the effects of removing Gateway from Case U, but the workgroup also wanted to be inclusive when adding potential projects to the candidate project list. Gateway Pacific was added to the list for consideration during the prioritization and selection process later in the day. See the “Case U Candidate Project List” tab of the Puget Sound VTRA 2015 What-If Case spreadsheet for more details.</p> <p>7. Captain Moreno provided an overview of potential what-if cases to discuss during brainstorming. These included Canadian and US projects through 2025, potential risk distribution changes that could result from crude oil exports, risk impacts of bunkering in Puget Sound, changes in traffic due to changing energy transportation, and changes in ship size.</p> <p>a. The workgroup discussed Canadian projects, including four potential LNG terminals, G3 grain terminal, Viterra Pacific Elevators grain terminal upgrades, Pacific Coast Terminals Potash and Canola projects, and a new fuel delivery system for the Vancouver Airport Fuel Facility Consortium.</p> <p>i. While there is some uncertainty about whether all four LNG projects will become operational within the time frame of the study, the workgroup agreed that to be inclusive all four projects should be added to the candidate project list for consideration.</p> <p>ii. The group also considered whether Roberts Bank Terminal 2 could be pushed out to 2030, which would be beyond the inclusion</p>	

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		<p>threshold for this update. Because the project documents (e.g., Marine Shipping Supplemental Report, page 6) anticipate reaching design capacity as early as 2025, Roberts Bank Terminal 2 was left in the candidate project list.</p> <p>iii. The Vanterm expansion project was discussed, but not included in the candidate project list because it is not expected to change the number of ship calls.</p> <p>b. For US projects, the workgroup added the following to the candidate project list for consideration: Tesoro Anacortes xylene upgrade, Westway expansion, potential reduction in bunkering due to TOTE Orca-class LNG conversion, energy changes due to increases in pipeline/rail movement of crude oil, increases in ship size at Northwest Seaport Alliance terminals, increases in Puget Sound bunkering due to potential future increased Columbia River traffic, and bunkering support from Puget Sound to the Columbia River.</p> <p>c. There were extensive discussions on whether a future crude oil export scenario should be included, and how such a scenario could be modeled.</p> <p>i. Several members of the workgroup, including Ecology, are interested in starting to explore what crude oil export could mean in terms of changes to risk in the Puget Sound. Industry members of the workgroup stated that there are no current plans to export crude from Puget Sound refineries, and that the refinery terminals are designed to receive oil using ship's pumps, not to pump oil onto ships.</p> <p>ii. There was also discussion of scenarios involving oil companies sending crude out of the Puget Sound to other US refineries for operational reasons. Fred Felleman said he had looked at Ecology Advance Notice of Transfer data for the past five years, and noticed an apparent increase in outbound crude oil movements after the increase in crude by rail shipments into Washington.</p> <p>iii. Rene offered to model a range of scenarios involving outbound tankers carrying crude oil as a way to begin to examine potential</p>	

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		<p>changes in risk without making assumptions about any plans to export crude,. Rene will run three cases, with 5%, 10%, and 25% of tankers in the 2015 base case carrying crude oil outbound from Puget Sound. He will report the results, but will not develop geographic profiles for these cases. The workgroup agreed with this approach.</p> <p>8. Vessel numbers associated with the projects on the candidate project list were taken from public documents and project websites. In some cases, the workgroup made assumptions about the mix of vessels that could call at a terminal. See the Puget Sound VTRA 2015 What-If Case spreadsheet, “Case U Candidate Project List” tab for workgroup assumptions, and the “Case U Definition” tab for vessel traffic source information.</p> <p>a. It was noted that the TOTE LNG conversion project is expected to reduce bunkering operations in Tacoma by 96 per year. Transits associated with TOTE bunkering operations were not specifically identified in the 2010 base case/2015 calibration case, so there is not a way to remove these transits as part of the what-if cases. The reduction in bunkering operations will not be reflected in the VTRA 2015 results.</p> <p>b. The proposed Shell Anacortes crude by rail facility and the proposed upgrades at Port of Tacoma Terminal Four and Port of Seattle Terminal 5 were discussed, but are not expected to increase vessel calls.</p> <p>c. Intra-Salish Sea movements involving vessels calling on multiple ports were discussed. Several members of the workgroup would like to have more visibility on trends and risk impacts of these calls. The AIS passage line data for 2015 includes movements from Puget Sound ports to Canadian ports, and the reverse. The southernmost passage line is at Admiralty Inlet, so the VTRA 2015 base case will not reflect movements between Tacoma and Seattle. The idea of a new what-if case to look at intra-Salish Sea movements was proposed, but members of the workgroup did not feel there was sufficient information to make assumptions about future trends.</p>	

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		<p>9. Bunkering assumptions. The workgroup discussed bunkering operations for US and Canadian calling vessels in the Salish Sea, vessels calling on Columbia River ports, and vessels transiting between Grays Harbor and Puget Sound.</p> <p>a. For vessels transiting the study area to call on US and Canadian ports, the workgroup decided to retain the same methodology used for the VTRA 2010 study. John Veentjer determined the average bunkering rate for different types of vessels, using data from 2010-2015; see the Puget Sound VTRA 2015 What-If Case spreadsheet, “Puget Sound Bunkering Data” tab. It was assumed that vessels associated with the what-if case projects would bunker at these same rates. For US calling vessels, this translated directly into an assumed number of bunkering operations, shown on the “Bunkering US” tab (with the exception of vessels bunkering in Port Angeles, see discussion under 9.c below). For Canadian calling vessels, it was assumed that the bunker fuel would be provided by barge transits from Puget Sound refineries to storage tanks in Canada. The amount of fuel required for the assumed bunkering operations was divided by the assumed barge capacity to produce a number of barge transits; see the “Bunkering Canada” tab.</p> <p>b. For the Westway project, the workgroup made a conservative assumption that all project vessels would transit from Grays Harbor to Puget Sound refineries. Based on the project Environmental Impact Statement, all vessels are assumed to be Crowley 550 ATBs. In preparing the spreadsheet, Ecology assumed project vessels would deliver oil to all five refineries, distributed proportionally to the refinery capacity. All project vessels are assumed to bunker within the Puget Sound, at Anacortes for the northern four refineries, and at Tacoma for those ATBs modeled as calling on US Oil. As noted in an e-mail to the workgroup on July 1, 2016, Ecology assumed that it was more realistic to model the ATBs transiting to/from Westway as bunkering every third trip rather than as bunkering every single trip.</p> <p>c. Vessels calling at Tesoro Anacortes to load xylene were assumed</p>	

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		<p>to bunker at the same rate as other tankers. The workgroup decided that the bunkering locations should be split between Port Angeles and Anacortes, proportional to bunkering between those locations from the 2015 ANT data, which was 88% in Port Angeles and 12% in Anacortes. It was assumed that fuel would be delivered by barge to a storage tank in Port Angeles. The amount of fuel required for the assumed bunkering operations was divided by the assumed barge capacity to produce a number of barge transits; see the “Bunkering US” tab.</p> <p>d. For bunkering related to potential future traffic calling on Columbia River projects, the workgroup agreed to use the proposed project assumptions from the Columbia River Vessel Traffic Evaluation and Safety Risk Assessment (CR VTSA). See the Puget Sound VTRA 2015 What-If Case spreadsheet, “LCR Projects” tab for projects and vessel numbers. A ratio of Columbia River calling vessels to Puget Sound bunkering operations was determined by comparing the number of vessels calling on Columbia River ports from the Ecology Vessel Entries and Transit 2015 data to the number of vessels transiting to or from Columbia River ports who entered the Puget Sound to take bunkers in 2015. This number was supplied by the Merchants Exchange of Puget Sound. The ratio of Columbia River callers to Puget Sound bunkering was applied to the number of new vessels from the CR VTSA study to find the additional number of bunkering operations. See bottom of the “LCR Projects” tab for the derived ratio and bunkering calculations. All bunkering operations were assumed to take place in Port Angeles.</p> <p>e. The workgroup also discussed bunkering on the Columbia River, and whether barge transits should be included to reflect bunker fuel being brought to the Columbia River. John Veentjer spoke with companies involved in bunkering operations on the Columbia, and determined that marine gas oil is being delivered to the bunkering companies by pipeline. Conversations that Ecology has had with the Columbia River Pilots indicate that there are currently no providers of heavy fuel oil on the river. No additional assumptions were made about adding barge traffic from the Puget</p>	

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		<p>Sound to support Columbia River bunkering.</p> <p>10. What-if case decisions.</p> <p>a. Case U. The workgroup reviewed the candidate project list to determine which projects would be included in the new cumulative case, Case U. There was consensus in retaining Case R (Trans Mountain pipeline expansion) and the updated Case S (BC project) as determined in the April 2016 meeting. The workgroup decided that leaving Gateway Pacific Terminal (VTRA 2010 Case Q) out of the cumulative case would provide more defensible results, based on the US Army Corps of Engineers decision. The workgroup also noted that Gateway was included in the updated 2010 what-if cases that were compared to the 2015 calibration case collectively and individually. Presentations showing the results of these cases are posted to Rene’s faculty page. From the list of candidate projects in Canada, the workgroup agreed to include the G3 Grain terminal, Pacific Coast Terminals Potash and Canola expansions, the Vancouver Airport Fuel Facility Consortium project and the Viterra Pacific Elevators grain project. US projects added to Case U were Tesoro Anacortes xylene and the Westway terminal. See the Puget Sound VTRA 2015 What-If Case spreadsheet, “Case U Definition” tab for details.</p> <p>b. Case U plus LNG. Members of the workgroup were interested in exploring the risk contribution of vessels associated with proposed LNG terminals in Canada. The VTRA model cannot model consequences associated with an LNG accident, it can only treat LNG vessels as cargo focus vessels. Because of this limitation, and because of uncertainty about which LNG projects may move forward, the workgroup decided not to include the LNG projects in Case U, but to have a separate what-if case that combined the Case U projects and the four LNG projects. See the Puget Sound VTRA 2015 What-If Case spreadsheet, “What-If Case U+LNG” tab for details.</p> <p>c. Case U (US only). A second what-if case was defined to look at just the risk contribution of the US projects in Case U (Tesoro Anacortes xylene and Westway, plus bunkering for these projects</p>	

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		<p>and bunkering for additional Columbia River traffic). Comparing the results from this what-if case to the results from Case U will also provide insights into the risk contribution from vessels calling on the Canadian projects. See the Puget Sound VTRA 2015 What-If Case spreadsheet, "What-If Case U (US Only)" tab for details.</p> <p>d. Case R 2015. For the third what-if case, the workgroup decided to compare the additional vessels associated with the Trans Mountain pipeline expansion to the 2015 base case. See the Puget Sound VTRA 2015 What-If Case spreadsheet, "What-If Case 2015 Case R" tab for details.</p> <p>11. During the selection of the three what-if cases, Lovel Pratt explained that she, Friends of the San Juans, and other groups are interested in analyzing the Trans Mountain theoretical future expansion scenario, as defined in Trans Mountain's response to the National Energy Board's Information Request Number 1, page 463 of 481. The theoretical future expansion scenario, if built and operated to capacity, could add an additional 112 tankers per year based on pipeline capacity. Other members of the workgroup were concerned with adding this as a what-if case, as there is not an approved or pending application for the increased capacity, and it is not clear that the project could occur within the time frame being considered. Some workgroup members also noted the challenges that could be involved with adding capacity, including storage at the Westridge terminal and competition for tide windows through the Second Narrows. Lovel asked if this analysis could be added as a standalone what-if case, if it was funded separately from the rest of the project. The workgroup discussed whether this would be done through the Ecology contract, and the results included in the VTRA 2015 final report, or if it would be a separate project. There was concern by some members that having outside groups fund a standalone what-if case could detract from the overall report. Brian Kirk noted it would add complexity and increase schedule risk to amend the Ecology contract, however Ecology agreed to investigate whether the existing contract could be used as a vehicle for adding funding. Subsequent to the meeting, Ecology estimated that approximately 200 hours of</p>	

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		<p>staff effort across multiple offices (Spills, HR, Fiscal) could be required to prepare, negotiate, process, administer, and close out the amendment. This level of effort makes it infeasible for Ecology to further consider managing an amendment for a standalone what-if case. Brian recommended Lovel consider contracting directly with GWU if the groups she is coordinating with wish to pursue the analysis. The result of this what-if case would be published as a separate report.</p> <p>12. Captain Moreno and the Ecology project team committed to following up with the workgroup to plan for the Risk Mitigation workshop, scheduled for July 19. The meeting adjourned at approximately 5:00pm on June 2nd.</p> <p>13. Following the meeting, a workgroup member received a suggestion that the group consider the projects and vessel traffic projections from Appendix B of the BP Cherry Point Vessel Traffic Analysis Study Report. While received after the workgroup had reached decisions on the what-if cases for the 2015 VTRA update, the recommendation is noted here for potential future consideration.</p> <p>14. Also after the meeting, Rene and Jason notified Ecology that creating the 2015 base case was taking longer than anticipated, and the Risk Mitigation workshop would need to be rescheduled in August. Ecology is coordinating new dates with the workgroup.</p>	
Ch13-036	Washington State Department of Ecology, Meg Bommarito, Yvonne Kicken	<p>5. On page ES-31, the DEIS says: "Based on the VTRA analysis of future spill risks, the proposed project's vessel traffic increases, and the marine vessel traffic route that would be used by the proposed project, the changes in spill risks due to the proposed project do not represent a significant increase in spill risks above the risks currently present."</p> <p>The prepared VTRA did not specifically address the traffic scenario of this proposed project so should not be used to conclude that the changes in spill risks due to the proposed project do not represent a significant increase in spill risks above the risks currently present. Additional analysis should be conducted to</p>	<p>The text of Section 13.5.6 is incorrect regarding the proposed project's inclusion in the VTRA. As stated in Section 3.9.1.4 of the Final EIS:</p> <p>the VTRA did not evaluate how spill likelihoods would change solely with the addition of project-related marine vessel traffic (i.e., 120 total vessel movements per year carrying xylenes and/or reformate); however the VTRA did evaluate a scenario that included the proposed project (inadvertently described as the "Tacoma Anacortes Upgrade"), along with several other potential projects, generating 232 additional tanker and ATB trips from U.S.</p>

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		<p>assess the spill risks of vessel traffic associated with this project.</p>	<p>ports.</p> <p>Section 3.9.3 of this Final EIS provides additional discussion of spill likelihood due to the proposed project.</p>
Ch13-037	Ruth Holder, Phillip Holder	<p>A. Marine Vessel Traffic and Spills The DEIS understates the impacts from vessel traffic and spills. The DEIS concludes that there would be only a 2.2% or less traffic increase compared to current large vessel traffic in the area. As the DEIS acknowledges, §3.2.2.2, impacts from the increase in vessel traffic is likely to be highest when looking at the areas identified in the DEIS where impacts would be highest - Guemes Channel (where mooring and unmooring activity is high) and Rosario Strait (where the overall waterway and channel width are narrower - since these are much higher risk areas to negotiate and a much larger percentage increase in the traffic specifically heading to and from Anacortes. Brushing off the impacts in busy Guemes Channel and narrow channel Rosario Strait without explanation, the DEIS proclaims “[t]hese considerations notwithstanding” ... “marine transportation impacts from proposed project operations would be less than significant.” In other words, “if we ignore these considerations, they become insignificant.” The FEIS must not rely on this sort of sophistry sleight of hand to build a conclusion about vessel traffic impacts or any other issue. Rather the vessel traffic analysis must deal directly with the significance of added vessel traffic in difficult to navigate areas because they are most likely to be vulnerable to accidents resulting spills.</p> <p>The DEIs does not identify the vessel route for the transport of reformat and instead makes the vague statement: “ATBs would be used to transport reformat to the refinery from Pacific Northwest sources.” §13.3.2.2. The FEIS must use an up to date and thorough vessel traffic risk analysis that includes all vessel traffic routes, including those used for anchorages (including bunkering) and the transport of reformat to the Tesoro refinery as well as the backhaul of gasoline blendstock. In addition the FEIS must ensure accurate analysis of the direct, indirect, and cumulative impacts of all reasonably foreseeable future vessel</p>	<p>As discussed in Section 13.3.2.2 of the Draft EIS, even if all 120 proposed project-related vessel movements were entirely new movements within the study area, total proposed project-related activity would result in an increase of 2.2 percent or less compared to current large vessel activity in the study area. The increase in vessel traffic as a result of the proposed project would represent a traffic increase of 0.1 percent, 2.2 percent, and 1.3 percent of large vessel activity within the three major waterways along the proposed marine vessel transportation route: the Guemes Channel, the south end of Rosario Strait, and the Strait of Juan de Fuca, respectively (see Table 13-9 of the Draft EIS). These numbers are based on an increase of 120 vessel movements for the proposed project as compared with historical data for large vessels transiting in and out of these waterways.</p> <p>Vessel traffic including tug escorts, vessel types, spill modeling including vessel fuel spills, spill likelihood, cumulative impacts, and spill response, including response plans, is further discussed in Section 3.9 of this Final EIS. Spill response plans are further discussed in Section 3.9.4 of this Final EIS.</p> <p>Southern Resident killer whales are further discussed in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for the protection of Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act s is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed project includes the transport of xylenes and reformat using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with</p>

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		<p>traffic.</p> <p>It is unclear from the DEIS whether assist tugs would accompany all project vessels (including ATBs) during transit mooring and unmooring operations. For example, the DEIS makes the ambiguous statement in §13.3.2.2: “[a]ssist tugs would provide maneuvering assistance to tankships during transit and during mooring and unmooring operations.” Does this mean ATBs would be accompanied by assist tugs during mooring and unmooring but not during transit? Or would ATBs always be unaccompanied by assist tugs? The DEIS is unclear about the specific vessel sizes being contemplated for this project. Why? The FEIS must answer these questions clearly and honestly.</p> <p>The DEIS finds that there is no difference in risk between articulated tug barges (ATBs) and tankers. In fact there is a significant difference in risk, because ATBs are very under regulated (e.g. ATBs are not required to have pilots and are not subject to the “no two deep draft vessels can meet head to head in Rosario Strait” rule.) Washington’s laws have not caught up with the increasing use of these vessels. Kaplan, A. HOUSE COMMITTEE VOTES ON EXTENDING TUG ESCORTS TO OIL BARGES. Investigate Northwest. March 30, 2017. http://invw.org/2017/03/30/oil-transportation-safety-bill-2017/. Accessed May 2017. (The legislation – HB 1611 - concerning oil transportation safety discussed in this article did not move forward in the regular session but has been reintroduced and retained in present status in the special session. It is strongly opposed by the oil industry.) The FEIS must recognize and factor in this important difference in risk between tankers and ATBs.</p> <p>Assist tugs for ATBs are especially important in light of the sensitive nature of the marine habitat and presence of the iconic Sothern Resident Killer Whales in the waters shared by the mixed xylenes project vessels. The FEIS must study the recent grounding and spillage of 50,000 gallons of diesel fuel and machine oils in another environmentally sensitive area in British Columbia. Hunter, J. The sinking of the Nathan E. Stewart. The Globe and</p>	<p>USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p> <p>The Draft EIS acknowledges that potential impacts of a worst-case spill could be potentially significant. See Section 13.5.8 for a summary of potential impacts to resources in the event of a worst-case spill.</p> <p>In the event of a spill, response organizations including those contracted by the refinery or the independently owned vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformat evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing</p>

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		<p>Mail. November 4, 2016. http://www.theglobeandmail.com/news/british-columbia/inside-the-response-to-a-tug-boat-sinking-off-bcs-northerncoast/article32672711/. Accessed May 2017. (“Three weeks later, dozens of ships are still on the scene cleaning up more than 100,000 litres of diesel fuel and 3,700 litres of lube oil, hydraulic oil, gear oil, and spent lubricants released by the sunken tug.”). The final EIS must include a recommended permit condition or binding mitigation requiring tug escort of ATBs in addition to tankers to minimize the risk of an accident resulting in a catastrophic spill or explosion all along the ATB route to or from the refinery and during mooring and unmooring .</p> <p>Any increase in vessel traffic means an increased risk of spills and the consequences of these incidents. More tanker and ATB traffic means a higher risk of toxic spills including reformat, mixed xylenes, gasoline blendstock, vessel fuel, and machine oil. The DEIS concludes that its modeling of the average most probable spill scenario for xylene and reformat “indicated that spilled xylene or reformat on the water surface would be below 0.1 µm thickness after 12 hours. Due to the short duration of the disturbance, the average most probable spill would have a less than significant impact on each resource evaluated.” The DEIS relies on modeling to reach this conclusion but fails to identify the limitations of its model. The FEIS must identify these limitations. The modeling should be peer reviewed by an independent expert.</p> <p>The DEIS focuses on the risk of impacts from spills to reach determination about significance, but ignores the high consequences of such events. WAC 197-11-794(2) provides in part: “An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.” The FEIS must evaluate the significance of spills giving appropriate equal weight to the risks and consequences, particularly due to the sensitive natural environment and resources involved in this matter. The DEIS leaves out entirely from consideration the spillage of fuel oil and machine oils (such as happened in Bella Bella in the incident cited above). The Final EIS</p>	<p>the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills.</p> <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill risks is discussed in Section 13.5.6.</p> <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p> <p>In addition to the VTS, the Draft EIS discusses the policies, procedures, and organizations that manage safety and operations in the waterways within the study area in Section 13.4.1.2. Anchorages and bunkering are discussed in Section 13.3. Additional information regarding the agencies responsible for marine vessel transit, spill prevention and response, and marine and nearshore resources is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Marine anchorage areas are used at times to secure vessels awaiting to discharge their cargos to a marine terminal. At those times the capacities of marine terminals may approach capacity necessitating a tankship to anchor and act as a floating storage unit. Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the</p>

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		<p>must also factor in spills of these materials.</p> <p>We agree with the comment made by Stephanie Buffum at the public hearing on April 17, 2017 concerning the question of whether the any vessel anchorages would be used for storage when the refinery is at capacity or otherwise. The FEIS must answer this question and if anchorages could potentially be used for storage, the FEIS must include them in spills analysis and modeling (including spills of petrochemical materials, propulsion fuels, and machine oils).</p> <p>The FEIS must take into account and include the information that Washington State is not adequately prepared to respond to spills in the Salish Sea, which could cause irreparable damage to our sensitive marine habitat and threaten iconic species like the endangered SRKW. There are no recovery standards for xylene or reformate, so accident prevention is especially important including using assist tugs for all vessels to be used for this project over the life of the project. The FEIS must carefully analyze the efficacy of prevention measures. The FEIS must include a comprehensive vessel traffic and spill (of all cargos and propulsion fuels and machine oils) assessment that analyzes all reasonably foreseeable future vessel traffic in the Salish Sea.</p>	<p>agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p> <p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6 of the Draft EIS. In addition, the Draft EIS considers cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13.</p>
Ch13-038	San Juan County Council, Jamie Stephens, Bill Watson	San Juan County borders Skagit County along Rosario Strait. The proposed Project's vessel traffic would transit the waters of and adjacent to San Juan County. Any Project spills, even those in Skagit or other neighboring counties, could adversely impact San Juan County's marine ecosystem, shoreline properties, marine transportation system, and economy.	The impact analysis in the Draft EIS and Final EIS analyzed potential impacts associated with an unplanned spill event, including areas of San Juan County and other counties along Rosario Strait. Analyses of impacts to areas along Rosario Strait include vessel traffic from operations; vessel traffic from spills and spill response; vessel safety during construction, operations, and maintenance; ferry traffic; and spills.
Ch13-039	Virginia Wolff	Vessel Traffic Impacts: Spill Risk and Impacts on Killer Whales The DEIS for this project dismisses the impacts of increased vessel traffic as insignificant. It claims the 120 additional tanker and barge trips carrying either reformate or xylene that this project would generate a year contribute only a 2.2% increase in large vessel traffic, thus the impacts on spill risk and wildlife, especially the	The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and accounted for spill prevention and response measures (response plans, equipment, and personnel). The likelihood and potential impacts associated with a marine spill are discussed in Section 13.5 of the Draft EIS. Additional information on marine transportation, including spill modeling,

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		<p>southern resident killer whales, would be low to negligible. This concerns me for the following reasons:</p> <ol style="list-style-type: none"> 1. The marine habitat in the San Juan Islands is sensitive and stressed, and a significant oil spill in these waters would be environmentally and economically devastating. Dismissing the impacts of a spill of xylene or reformat as insignificant because they float and would soon evaporate into CO₂ and water is not convincing, since the product themselves are admittedly toxic. 2. This increase in vessel traffic would be happening in conjunction with the additional 34 vessels a month the Kinder Morgan expansion would add to these waters. These impacts should be studied comprehensively and include any other reasonably foreseeable increases in future vessel traffic. 3. From the perspective of a small recreational boater (We have a 30 ft. sailboat moored in Anacortes), navigating Guemes Channel during times of heavy boat traffic is significantly different from navigating the Strait of Juan de Fuca or Rosario Strait. The channel is narrow, currents can be strong, and it is often windier than elsewhere. Recreational, commercial and ferry traffic seems noticeably heavier in Guemes Channel than in the larger straits, and much of it converges on Anacortes near March Point. This constellation of geography and water use creates risks that don't reduce easily to the impacts of "only a small percent increase in large vessel traffic." 4. The shoreline around March Point includes sensitive estuarine habitat that many species of fish, shellfish, birds and food for orcas depend upon. The spongy sediment along the shoreline is more vulnerable than a rocky shore to an oil spill. The DEIS maintains that xylene and reformat would float dissipate within hours to a few days, and spills involving these substances would do no longterm harm, yet doesn't offer proof of why this is so. 5. Tesoro doesn't have a good safety record. Relying on Tesoro's oil spill risk and response management shouldn't be considered 	<p>likelihood, and response, is included in Section 3.9 of this Final EIS.</p> <p>The Draft EIS discusses the potential impact on Southern Resident killer whales resulting from spills in Section 7.4.3. Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for marine vessel traffic and for Southern Resident killer whales is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>1, Significance of a spill event</p> <p>While the chemical properties of xylene and reformat were considered in evaluating potential impacts resulting from a spill of either chemical, a number of other factors were also accounted for in assessing potential significance including the likelihood for a spill to occur and the spill response. The Draft EIS accounted for the likelihood of a spill occurring based on the historical record and spill prevention measures to minimize the likelihood of a spill occurring. In the event of a spill, the spill response was also taken into consideration in assessing risk as well as the chemical properties of xylene and reformat. Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS.</p> <p>2, Cumulative impacts</p> <p>The Draft EIS discusses the potential impacts on vessel traffic from the increase in vessels as a result of the proposed project in Section 13.3. The Draft EIS discusses cumulative impacts from increased vessel traffic from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>In addition to the cumulative impacts discussed in Section 13.6, reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS. This table includes the Kinder Morgan Trans Mountain Pipeline Expansion project and others with the</p>

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		<p>sufficient preventative management. (See more below under “Refinery Safety Concerns.” The DEIS states that xylene to be exported overseas would be carried in tankers carrying approx. 330,000 bbl. Reformate coming from other West Coast refineries, and reformate backhaul being returned would be carried in ATB’s carrying approx. 180,000 bbl. Regarding the tankers and ATB’s proposed for carrying reformate and xylene:</p> <ol style="list-style-type: none"> 1. The DEIS examines oil spill planning only considering spill of cargo carried by tankers and ATBs, not the fuel that powers the vessels. Bunker fuel would behave very differently in a spill than would reformate and xylene, and would require differences in spill response. 2. The DEIS states (13-4)... “there is no meaningful difference between tankships and the other large vessels....” “Tankship” is used to describe both tankers and ATBs. It is not true that these vessels (tankers and ATBs) carry equal risk, as ATB’s are under-regulated. They are not required to have pilots, and not held to the rule that “no two deep-draft vessels can meet head to head in Rosario Strait.” There was a significant spill involving an ATB in BC last year, when an empty un-piloted ATB ran aground in Canada’s Inside Passage near Bella Bella and spilled diesel fuel. http://vancouver.sun.com/news/local-news/petroleum-bergs-bergs-aground-nearbella-bella If ATB’s are carrying highly toxic and dangerous chemicals, they should be required to have pilots. Additionally, ATB’s can make multiple ports of call within the study area, yet only be counted as one vessel. This would seem to compound the risk they represent since maneuvering and docking operations carry increased risk. 3. The DEIS states that all tankships over 40,000 DWT are required to have tug escorts in Puget Sound (RCW 88.16.170 to 190, DEIS 13-4), and “Tank ships with a capacity of approximately 330,000 bbl would transport out going mixed xylenes product from the refinery.” (DEIS 2-40) It isn’t clear that vessels carrying 330,000 bbl would be over 40,000 DWT, thus requiring tug escort. 	<p>potential to impact resources in the study area.</p> <p>3, Recreation boating</p> <p>Vessel traffic, including potential impacts to the ferry system and recreational boating, is further discussed in Section 3.9.1 of this Final EIS.</p> <p>4, Fate and behavior of a xylene spill</p> <p>The Draft EIS discusses the fate and behavior of mixed xylenes in the marine environment in Section 13.5.2 and Appendix 13-A, including supporting citations and references, page 63 of the appendix. Chapters 3 through 13 of the Draft EIS discuss the potential impacts from the proposed project.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>5, Safety record</p> <p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <p>Operational site controls – Section 2.8.5</p> <p>Existing operations and controls, process safety management,</p>

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		<p>4. The DEIS states (2-40): “Assist tugs would provide maneuvering assistance to cargo vessels during transit and during mooring and unmooring operations.” It isn’t clear whether or not “transit” means transit throughout the Salish Sea, i.e. east of Port Angeles.</p>	<p>preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A</p> <p>Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6</p> <p>Coordination and training of Tesoro and local emergency service providers – Section 11.4</p> <p>The refinery’s safety culture is further discussed in Section 3.6.3 of this Final EIS.</p> <p>1, Vessel fuel spill</p> <p>Spill modeling, including a discussion of propulsion fuels, is included in Section 3.9.2 of this Final EIS.</p> <p>2, 3, 4, Tankships</p> <p>The statement that “marine transportation impacts...would be less than significant” applies only to the analysis of <i>marine traffic operations</i>, i.e., the degree of congestion, delay, and difficulty likely to occur in study area waterbodies. This is entirely separate from vessel traffic <i>safety</i> (discussed in Draft EIS Section 13.4), and the risk and impact of marine <i>spills</i> (discussed in Section 13.5). Section 13.5 of the Draft EIS specifically discusses the overall risk (as cited in the VTRA) of spills in the study area, as well as the risk of spills in Guemes Channel and Rosario Strait.</p> <p>The proposed project includes the transport of xylenes and reformat using tankships and tank barges as described in Section 2.8.2 and Chapter 13 of the Draft EIS during transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway</p>

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			<p>between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>
Ch13-040	Pilchuck Audubon Society, Allen Gibbs	<p>We are mindful of potential adverse effects from the tremendous increase of other fossil fuel transport through the Salish Sea from British Columbia, now that the federal Canadian government has given some “green lights” to Kinder Morgan Trans Mountain pipeline expansion. We as American citizens do not have much influence upon what our northern friends opt to do in exploiting their natural resources. Unfortunately, those “green lights” will greatly increase spill risks through the shared Salish Sea of both countries.</p>	<p>The Draft EIS discusses the potential impacts on vessel traffic from the increase in vessels as a result of the proposed project in Section 13.3. The Draft EIS discusses cumulative impacts from increased vessel traffic from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>In addition to the cumulative impacts discussed in Section 13.6, reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS. This table includes the Kinder Morgan Trans Mountain Pipeline Expansion project and others with the potential to impact resources in the study area.</p>

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			<p>Spill modeling, including propulsion fuels, and spill likelihood and cumulative impacts are further discussed in Section 3.9 of this Final EIS.</p>
Ch13-041	Fidalgo Bay Aquatic Reserve Citizen Stewardship Committee	<p>The 60 additional yearly vessel trips to the Tesoro dock represent about a 25% increase over the typical 200 – 250 vessel trips there now. The EIS draft has no mention of any additional precautions, extra response capacity, or mitigation due to that increased potential for spills of oils, gasoline, reformate, or xylene right in the near vicinity. We think that additional Fidalgo Bay traffic issue needs independent study and additions to the ability to respond to what will be increased risk for spills.</p> <p>If a spill happens in nearby open water before docking and pre-booming, the ability to get a long boom deployed to protect Fidalgo Bay would be problematic if even possible. Further, the area where the boom would need to be deployed over a long distance is prime sea grass habitat which could easily be severely damaged by the attempts to anchor the boom, particularly in rough water and winds and currents.</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill risks is discussed in Section 13.5.6 of the Draft EIS.</p> <p>The refinery’s existing spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Information regarding agencies responsible for permitting and overseeing these plans is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level. For example, if a spill were to occur in the vicinity of Fidalgo Bay, booms could be deployed downwind or down current of a spill bay to prevent the spilled material from reaching Fidalgo Bay.</p> <p>Requirements for the safe handling, transportation, and storage</p>

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			<p>of mixed xylenes are administered by the USCG, Ecology, and USEPA. Laws, regulations, and guidance about safe handling and storage at the refinery are described in Section 3.1 and for marine transportation are described in Section 13.1 of the Draft EIS. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-042	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Impacts of a spill on Washington State Ferry Service should be included</p> <p>In 2016, there were 11,879 sailings to and from the Washington State Ferry Terminal in Anacortes. These 11,879 ferry crossings intersected the project's vessel route in Rosario Strait. A disruption spill, collision or otherwise that impacts the Anacortes Ferry Terminal's ferry routes to the San Juan Islands could be devastating, even if such a disruption lasted for just a few days. Ferries are the marine highway and primary transportation route for islanders and island visitors. Grocery stores that receive all their merchandise via ferries have only approximately 2 and 1/2 days' worth of food in stock. The loss of this highway, even for a short time, would pose severe risks to both human health and the local economy.</p> <p>Large passenger vessels (e.g., WA State Ferries and cruise ships) are only addressed in Table 136: Selected VEAT Data (page 1311). The FEIS should include a more comprehensive analysis of this risk.</p> <p>Marine Vessel Anchorages</p> <p>The risk assessment appears to assume that project related vessel traffic will come and go without stopping. This simply is not the way that traffic in the Salish Sea operates. The DEIS is also silent on the fact that anchorages are used for storage when refineries' landbased storage facilities have no additional capacity. The FEIS must model oil spill and vessel traffic impacts related to the additional project related anchorage needs with an analysis of the use of anchorage areas for storage when there are capacity</p>	<p>The Draft EIS discusses the impacts of a spill on vessel traffic in Section 13.2.3.1. Impacts to ferry traffic are further discussed in Section 3.9.1.3 of this Final EIS.</p> <p>Spill modeling locations were chosen to represent a spill at the refinery wharf and at locations along the marine vessel transportation route through the Salish Sea, including Rosario Strait, near Port Angeles, and near Neah Bay. These locations were selected from a list of recommended project-specific modeling locations provided by Ecology as locations where spills are likely to occur. The spill modeling methodology is described in Section 13.5.4 and Appendix 13-A of the Draft EIS.</p> <p>Marine transportation, including spill modeling and bunkering, is further discussed in Section 3.9 of this Final EIS.</p> <p>Marine anchorage areas are used at times to secure vessels awaiting to discharge their cargos to a marine terminal. At those times the capacities of marine terminals may approach capacity necessitating a tankship to anchor and act as a floating storage unit. Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p> <p>Bunkering activities are described in Section 13.1 and 13.3.1.4 of the Draft EIS. Bunkering activities must comply with applicable provisions of federal and state regulations (WAC 317-40). Placing boom around vessels docked at the wharf during transfer operations is now required and is a preventive measure to contain oil in the event of an incident while loading or unloading</p>

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		<p>limitations at Washington State’s refineries.</p> <p>The anchorage areas at Vendovi Island and Port Angeles Harbor Anchorage are not codified and are included in the USCG’s anchorages rulemaking that is currently in process (with a public comment period until May 11, 2017). The DEIS includes references to vessel traffic risk analyses for the Gateway Pacific Terminal (GPT) Project. However, the DEIS omits the 2014 VTRA [Vessel Traffic Risk Assessment] 2010 Final Report: Preventing Oil Spills from Large Ships and Barges in Northern Puget Sound & Strait of Juan de Fuca (VTRA 2010) analysis of GPT’s bunkering activity while at anchor at Vendovi. The VTRA 2010 modeled GPT to include 47% of GPT vessels bunkering on the inbound transit at the Vendovi anchorage area. This oil spill risk analysis only modeled the ships at anchor and the bunkering related vessel traffic and did not model the risk of oil spills from the bunkering operations. In conducting a maximum benefit analysis, the No Bunkering Risk Mitigation Measure (NB RMM) removed all bunkering activity at Vendovi Island anchorages from the model. The results of this NB RMM analysis show a 9.7% reduction in the risk of oil spills by volume and a 6% reduction in the risk of accidents in the entire VTRA study area (which includes all of the Salish Sea south of the 49th parallel and west out to the entrance to the Strait of Juan de Fuca and the outer coast of Washington’s Area to Be Avoided). (See page 125 http://www2.seas.gwu.edu/~dorpjr/VTRA/PSP/FINAL%20REPORT/PSP%20FINAL%20REPO RT%20033114%20%20WITH%20LABEL%20CORRECTION%20%2020REDUCED.pdf van Dorp, J.R., and J. Merrick. 2014. 2014 VTRA 2010 Final Report: Preventing Oil Spills from Large Ships and Barges in Northern Puget Sound & Strait of Juan de Fuca. Prepared for Washington State Puget Sound Partnership. 163 p.)</p> <p>The FEIS should:</p> <ul style="list-style-type: none"> ? Identify the status of and allowed uses within all proposed anchorages in the study area. ? Model spills at all proposed anchorages where bunkering could 	<p>oil. Pre-booming around a vessel while loading or unloading light-end hydrocarbons such as xylene and reformates can create a safety hazard primarily associated with fire and is not a viable mitigation measure. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>take place.</p> <p>? Model spills for all project related vessels while at anchor from both the anchorage and bunkering associated vessel traffic and the bunkering operations.</p> <p>At a minimum, if the project is approved, both the FEIS and the shoreline permits should require binding mitigation conditions that prohibit bunkering for all project related vessels while at anchor and/or require all project related bunkering activity to take place only at the Tesoro dock and only with prebooming, with no exceptions.</p>	
Ch13-043	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Vessel Traffic and Spill Risks</p> <p>The DEIS references the VTRA (Vessel Traffic Risk Assessment) 2015 (VTRA 2015 Final Report Updating the VTRA 2010: A Potential Oil Loss Comparison of Scenario Analyses by Four Spill Size Categories), but only addresses the risk assessments for the whatif scenario USKMCA1600 which does not include the four LNG projects that are included in the whatif scenario USKMALN2250. The DEIS also references the Glosten study (Gateway Pacific Terminal (GPT) Vessel Traffic and Risk Assessment Study (VTRAS)) which is outdated. In addition to omitting the LNG projects, the Glosten study also omits the Vancouver Airport Fuel Facility Consortium (that will transport aviation fuel from a WA State refinery(ies) to BC), Fraser Surrey Docks, Canada’s increase in grain exports (including the Cargill, G3, and Viterra Pacific terminal projects), container vessel traffic increases (including Centerm and Roberts Bank Terminal 2), and the increase in the size of container vessels calling at ports in both the US and Canada, and increases in cruise ship traffic.</p> <p>Moreover, the DEIS does not address the potential increase in vessel traffic from the 2015 lifting of the federal ban on crude oil exports. Ecology’s 2014 Marine and Rail Oil Transportation Study states (on page 8), “If the federal ban on oil exports is lifted on U.S.produced oil, then crude oil could move through our state to offshore markets. Each added transfer in the delivery chain</p>	<p>The Draft EIS discusses cumulative impacts from increased vessel traffic from past, present, and reasonably foreseeable future actions in Section 13.6. In addition to the cumulative impacts discussed in Section 13.6, reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS.</p> <p>The USKMALN2250 scenario, as described in the VTRA, includes the USKMCA1600 scenario, plus numerous additional terminal projects (such as those listed in the comment). Under the USKMCA1600 scenario, approximately 1,600 additional large commercial vessel calls would occur per year in the greater Salish Sea region. This is equivalent to approximately a 50 percent increase in the maximum number of large vessel calls ever recorded in the Salish Sea (3,070 in 2008). This level of increased vessel traffic would accommodate the proposed project’s vessel traffic (60 vessel calls under scenario US232), the Trans Mountain expansion project in British Columbia (348 vessel calls under scenario KM348), a collection of 23 tankers from other terminal projects (CA1020), plus an additional 169 tanker and ATB calls at other possible project expansions. The same scenario also included an increase of 1,000 non-tanker bulk carrier and cargo vessel calls in the Salish Sea (for a total of approximately 1,600 vessels). This scenario was selected for analysis since it would</p>

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		<p>increases the potential for oil spills.” (See https://fortress.wa.gov/ecy/publications/documents/1508010.pdf .) The federal ban on exporting US crude oil was lifted in December 2015.</p> <p>The FEIS must include a comprehensive vessel traffic risk assessment that includes all the vessel traffic routes, including those used for anchorages (which can include bunkering) and the transport of reformat to the Tesoro refinery from other west coast refineries and the backhaul of gasoline blendstock.</p> <p>The FEIS should also include a risk assessment of spills and associated impacts of all project related cargos and propulsion fuels using all reasonably foreseeable future vessel traffic for the operational lifetime of the project. Multiple scenarios describing reasonably foreseeable future vessel traffic volumes could be necessary. For all cargo and propulsion fuel spill risks, changes in atmospheric and oceanographic conditions that will occur because of climate change should be fully integrated into the analysis. This could involve the development of multiple scenarios that consider extreme weather events and storm surge among other impacts.</p>	<p>account for the increased traffic associated with the proposed project without being overly conservative with respect to the potential increase in marine vessel traffic from other reasonably foreseeable future actions. The USKMCA1600 scenario thus provides a reasonable basis for analysis of cumulative impacts.</p> <p>The Draft EIS discusses anchorages and bunkering in Section 13.3.1. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p> <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The likelihood of a spill occurring in the Salish Sea is discussed in Section 13.5.6. A summary of potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5.8. The increase in vessels as a result of the proposed project is discussed in Section 13.3, and the potential for increases in vessel traffic to increase spill risks in Section 13.5.6 and 13.6. Cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions are discussed in Section 13.6.</p> <p>Additional considerations for spill modeling, including adverse weather and propulsion fuels, spill likelihood, and cumulative impacts are included in Section 3.9.2 and 3.9.3 of this Final EIS.</p>
Ch13-044	Evergreen Islands	<p>RECOMMENDATION</p> <ul style="list-style-type: none"> • Add the permit condition: Tug escorts shall assist laden Assisted Tug Barges (ATBs) that transit Guemes Channel and the Saddlebag/Huckleberry water ways of Skagit County. <p>THE SIGNIFICANT INCREASE IN MARINE SHIPPING IN THE SALISH SEA</p> <p>Proposed Increase in Marine Oil Shipments Chapter 2 of the CPUP DEIS includes the following information (emphasis added):</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to</p>

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		<p>Marine vessel traffic would increase by approximately 60 vessels per year (approximately 5 per month). Approximately 40 of those vessels would be delivering reformat feedstock from external sources. The remaining 20 vessels calling at the refinery wharf structure would be for exporting mixed xylenes.</p> <p>The reformat feedstock would be received at the Tesoro Anacortes Refinery by marine vessels transiting from other West Coast refineries. Refinery locations and, therefore, the marine vessel transportation routes, would vary depending on market conditions. After the reformat feedstock is unloaded, the vessels would be loaded with gasoline blendstock from the ARU (i.e., the remaining gasoline from reformat feedstock, after the mixed xylenes have been extracted). This gasoline blendstock would then be backhauled to the original refinery that supplied that reformat feedstock.</p> <p>Xylenes and reformat would primarily be transported by the following types of marine vessels:</p> <ul style="list-style-type: none"> • Tank ships with a capacity of approximately 330,000 bbl would transport outgoing mixed xylenes product from the refinery. • Tank barges with a capacity of approximately 180,000 bbl and articulated tug and barge (ATB) vessels would transport reformat to the refinery and reformat backhaul from the refinery. • Assist tugs would provide maneuvering assistance to cargo vessels during transit and during mooring and unmooring operations. <p>2015 Vessel Traffic Risk Assessment (VTRA) Strait of Juan de Fuca, Puget Sound, San Juan Islands and connecting waterways Ecology sponsored the 2015 VTRA, which provides updated information about the risks of oil spills from commercial vessel traffic currently operating on the Salish Sea. It also models potential impacts from planned future developments as well as potential benefits from a variety of spill prevention measures. principal investigators from George Washington University and Virginia Commonwealth University conducted the assessment.</p>	<p>the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>

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		<p>The 2015 VTRA Final Report executive summary¹ indicates that the waterways with the highest risk of “potential oil loss” are as follows:</p> <p>1. Haro Strait / Boundary Pass 2. Rosario Strait 3. Guemes Channel 4. Saddlebag / Huckleberry Figure 1 illustrates the locations of the high-risk waterways. Note that the Guemes Channel and Saddlebag / Huckleberry high-risk waterways are in Skagit County.</p> <p>[Figure. 1 Waterways with the Highest Risk of "Potential Oil Loss"]</p>	
Ch13-045	Evergreen Islands	<ul style="list-style-type: none"> • What are the abilities 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? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Ch13-046	Orca Network, Howard Garrett	Orca Network strongly opposes the the production of xylene in Anacortes, the many toxic materials used in its manufacture, and the increased tank vessel traffic that would exacerbate the acoustic noise in essential foraging habitat of both Resident and Transient orcas, and increases the risk of an oil spill — or worse — a xylene spill.	Thank you for your comment.
Ch13-047	Orca Network, Howard Garrett	<p>Here are just a few ways this project would inevitably degrade the ecological productivity of the Salish Sea, thus harming orcas and human residents:</p> <p>...</p> <ul style="list-style-type: none"> • More tank vessel traffic will increase the risk of xylene, reformate and propulsion fuel spills. 	<p>The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6 of the Draft EIS. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The Draft EIS discusses the potential impacts of increased marine vessel traffic, vessel noise, and marine spills on marine wildlife, including Southern Resident killer whales, in Section 7.4. Potential impacts of xylene and reformate to human health in the event of a spill are discussed in Section 9.6.2.</p> <p>The refinery’s existing spill prevention and response plans,</p>

ID	Contact	Comment Text	Response
			<p>including the oil spill contingency plan, would be modified to accommodate the proposed project. Information regarding agencies responsible for permitting and overseeing these plans is provided in Table 2 in Section 3.1 of this Final EIS. Spill prevention and response measures and available spill response resources are discussed in the following sections of the Draft EIS:</p> <p>Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A</p> <p>Vessel safety and waterway management – Section 13.4</p> <p>Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG and Ecology. Additional information regarding agencies responsible for marine vessels, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding human health effects is provided in Section 3.6 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-048	Orca Network, Howard Garrett	<p>We ask that the Final Environmental Impact Statement include:</p> <p>...</p> <ul style="list-style-type: none"> • A comprehensive vessel traffic and spill assessment that analyzes all project cargoes and propulsion fuels and all reasonably foreseeable future vessel traffic in the Salish Sea, including Canadian vessel traffic and the increase in the size and frequency of container ships calling at ports in the US and Canada. 	<p>The Draft EIS discusses the potential impacts on vessel traffic from the increase in vessels as a result of the proposed project in Section 13.3. The Draft EIS discusses cumulative impacts from increased vessel traffic from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>In addition to the cumulative impacts discussed in Section 13.6, reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of</p>

ID	Contact	Comment Text	Response
			<p>the Draft EIS. This table includes the Kinder Morgan Trans Mountain Pipeline Expansion project and others with the potential to impact resources in the study area.</p> <p>Spill modeling, including propulsion fuels, and spill likelihood and cumulative impacts are further discussed in Section 3.9 of this Final EIS. The text in Section 13.5.6 of the Draft EIS is incorrect regarding the proposed project's inclusion in the VTRA. As stated in Section 3.9.1.4 of the Final EIS, the VTRA did not evaluate how spill likelihood would change solely with the addition of project-related marine vessel traffic (i.e., 120 total vessel movements per year carrying xylenes and/or reformate); however, the VTRA did evaluate a scenario that included the proposed project (inadvertently described as the "Tacoma Anacortes Upgrade"), along with several other potential projects, generating 232 additional tanker and ATB trips from U.S. ports.</p> <p>Section 3.9.3 of this Final EIS provides additional discussion of spill likelihood due to the proposed project.</p>
Ch13-049	Katherine Johnson	The fact that this product will be sent to Asia, increasing vessel traffic in the Salish Sea and Pacific Ocean is extremely worrisome. We absolutely cannot afford a spill or the increase in emissions	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5. The potential impacts on vessel traffic and vessel safety from the increase in vessels as a result of the proposed project are discussed in Sections 13.3 and 13.4.</p> <p>The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality – Sections 4.4.3 and 4.4.4 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Vessel traffic , vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5

ID	Contact	Comment Text	Response
Ch13-050	Richard Johnson	I am concerned about increased tanker traffic through the San Juan Islands and the Strait of Juan de Fuca, resulting in an increased risk of toxic spills.	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6 of the Draft EIS.</p> <p>The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. The potential impacts on vessel traffic and vessel safety from the increase in vessels as a result of the proposed project are discussed in Sections 13.3 and 13.4.</p> <p>Additional information regarding spill likelihood, including the increased spill likelihood due to increased vessel traffic, is provided in Section 3.9 of this Final EIS.</p>
Ch13-051	Bay Renaud	Please do not allow increases in tanker traffic and/or rail traffic of explosive crude oil or xylene. The risks of spills and explosions are not worth it to our environment, local economy, or natural resources.	Thank you for your comment.
Ch13-052	Ann Brooking	I believe the EIS should take a closer look at the effects of xylene spills here in our area as well as en route to the overseas recipients of xylene.	<p>The potential impacts to specific resources in the event of a marine spill are discussed in Chapters 3 through 13 of the Draft EIS, and a summary from each chapter is provided in Section 13.5.8 for each resource topic (see Tables 13-29 and 13-30).</p> <p>The potential impacts if a spill were to occur at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Geologic resources – Section 3.3.2.3 • Air quality and greenhouse gas – Section 4.4.4.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Human health – Section 9.6.2 • Land and shoreline use – Section 10.3.2

ID	Contact	Comment Text	Response
			<p>The study area for marine transportation including associated potential spills extended to the edge of US territorial waters - 12 nautical miles from the entrance to the Strait of Juan de Fuca - as discussed in Section 13.2.1 of the Draft EIS. SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). The lack of information and uncertainty about the routes and destinations of the mixed xylenes once they leave U.S. waters would require significant assumptions resulting in a speculative analysis that would not result in useful information for agency officials to make decisions about potential impacts of the proposed project.</p>
Ch13-053	Patricia Young	<p>Will it be 60 or 120 extra vessel trips of loaded barges and tankers that will navigate the already crowded and narrow passages of the Salish Sea? Just one spill could decimate this fragile area that is home to endangered orcas and salmon. Small craft – sail boats, kayaks, canoes - abound in this area. Dodging the ferries is one thing, but keeping safe in the midst of an expanding fleet of tankers is akin to playing Russian roulette.</p>	<p>The proposed project involves an additional 60 vessels traveling to and from the refinery annually (120 vessel trips).</p> <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS.</p> <p>The potential impacts to Southern Resident killer whales, fish, and boaters if a spill were to occur along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine and nearshore resources, including Southern Resident killer whales and salmon – Section 7.4.3 • Recreation, including boaters – Section 10.4.2 • Tribal fisheries and aquaculture – Section 11.5.2.4 • Vessel traffic and vessel safety, including ferry traffic – Sections 13.3.2.3 and 13.4.2.3 <p>The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p>

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Land and shoreline use, and recreation, including boating – Sections 10.3.2, 10.4.2, and 10.5.2 • Vessel traffic including ferries, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>Additional information regarding vessel traffic, including recreational boating and the ferry system, is provided in Section 3.9 of this Final EIS.</p>
Ch13-054	Ben Bama	<p>Escort tugs need to be required for all ships carrying project cargos.</p> <p>A petroleum spill of any kind would be devastating to both the ecology and economy of the Salish Sea. Please, let's not take any more risks than we already are.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180). All project-related tankers transporting petroleum-based materials including xylene and reformatate would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformatate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are</p>

ID	Contact	Comment Text	Response
			administered by the USCG. Additional information regarding the agencies responsible for regulating the piloting of vessels is provided in Table 2 in Section 3.1 of this Final EIS.
Ch13-055	Greg Oaks	The increase in 220 tanker trips through the Salish Sea. I think if one spills, it would be a catastrophe and the increased taker traffic is really objectionable. So just want to strongly object.	The increase in tankers is 60 per year, 120 transits through the vessel traffic lanes. Additional information regarding the agencies responsible for regulating vessel traffic is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-056	Mary Heath	<p>Vessel Spills</p> <p>The EIS must more closely examine the potential for increased spills and accidents due to the projected larger volume of traffic.</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6 of the Draft EIS. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5. The potential impacts on vessel traffic and vessel safety from the increase in vessels as a result of the proposed project are discussed in Sections 13.3 and 13.4 of the Draft EIS.</p> <p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-057	Ruth Allen	The Draft EIS for the expansion of operations at the Tesoro Anacortes Refinery does not provide adequate assessment of ...risks of increased tanker traffic & potential spills	Additional information regarding vessel traffic, including potential impacts from a marine spill, is provided in Section 3.9 of this Final EIS. This Final EIS discussion is a supplement to the spill likelihood analysis provided in Section 13.5 of the Draft EIS.

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			Marine vessel safety and waterway management are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating spill prevention and control is provided in Table 2 in Section 3.1 of this Final EIS.
Ch13-058	Mike Allen	It [the Draft EIS] also needs to require the highest standards during the transport, refining & shipping of xylene.	Thank you for your comment.
Ch13-059	Natalie Menacho	<p>I am incredibly alarmed by Tesoro's plan for Xylene shipping in the Salish Sea. The increased vessel traffic is harmful for our local orca whales and the possibility of a deadly spill is much too high to risk.</p> <p>Please help protect the Salish Sea. This is my home and a spill would be disastrous.</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. The increase in vessels as a result of the proposed project is discussed in Section 13.3.</p> <p>The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine and nearshore resources including Southern Resident killer whales – Sections 7.4.2 and 7.4.3 • Vessel traffic, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>Additional information regarding vessel traffic, including potential impacts from a marine spill, is provided in Section 3.9 of this Final EIS.</p>
Ch13-060	Val Veirs	Large American and Canadian vessels travel through the Haro Strait directly in front of our house - we need to see a thorough review of all vessel traffic with consideration given to types of fuel and spill assessment. Consideration of impacts of a spill to the Washington State Ferry System is essential. All project-related tankers should have a tug escort when traveling from the Strait of Juan de Fuca to Vancouver, regardless of their size. Impacts if a spill to our National Historic Parks, plus San Juan Islands State and	<p>The vessels associated with the proposed project do not transit through the Haro Strait, see Figures 13-2 through 13-6 in the Draft EIS. Additional information regarding potential impacts on the ferry system is provided in Section 3.9 of this Final EIS.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be</p>

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		<p>County Parks, should be assessed. The ecological and economic implications are mind-boggling; we should be thoroughly prepared in case of such a disaster.</p>	<p>navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180). All project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the</p>

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			<p>products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>The potential ecological and economic impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in Chapters 3 through 12 of the Draft EIS.</p>
Ch13-061	Joan Poor	<p>The final EIS must include a requirement that all project-related laden tank vessels of any size be escorted by tugs that will assure safe transit through the Salish Sea east of Port Angeles and that the project provide for economic and environmental impacts to the San Juan Island National Historical Park from all project-related vessel cargo and fuel spills.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180). All project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1

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			<ul style="list-style-type: none"> • Pilot and tug escort requirements – Section 13.4.1.2 <p>Spill modeling results indicate that an uncontrolled worst-case scenario spill in Rosario Strait along the marine vessel transportation route would not reach San Juan Island. Direct impacts are not anticipated on San Juan Island National Historical Park. Additional information is provided in Section 3.8 of this Final EIS.</p> <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating the piloting of vessels is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding cleanup costs in the event of a spill is provided in Section 3.7.2 of this Final EIS. Additional information regarding potential impacts from marine spills of cargo or propulsion fuels is provided in Section 3.9.2 of this Final EIS.</p>
Ch13-062	Joe Bucek	The EIS must more closely examine the potential for increased spills and accidents due to the projected larger volume of traffic.	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood is discussed in Section 13.5.6 of the Draft EIS.</p> <p>The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5. The potential impacts on vessel traffic and vessel safety from the increase in vessels as a result of the proposed project are discussed in Sections 13.3 and 13.4.</p> <p>The Draft EIS analyzed the potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire, explosion, and spills to land and the marine environment. The potential impacts from unplanned events are described in the following sections of the Draft EIS:</p>

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Spill likelihood and response, and summary of impacts from spills on environmental resources – Section 13.5 • Marine and nearshore resources – Section 7.4.3 • Vessel traffic – Section 13.3.2.3 <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating spill prevention and control is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-063	Howard Cherrington	Include a comprehensive vessel traffic and spill (of all cargos and propulsion fuels) assessment that analyzes all reasonably foreseeable future vessel traffic and other potential impacts of spillage or collisions in the Salish Sea.	<p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6 of the Draft EIS. In addition, each resource chapter in the Draft EIS (Chapters 3 through 13) discusses cumulative impacts from past, present, and reasonably foreseeable future actions. Reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic and the potential for propulsion fuel spills is provided in Section 3.9 of this Final EIS.</p>
Ch13-064	Kristin Fetters-Walp	The increased traffic of tankers (and potentially trains) carrying toxic, flammable xylene through our Salisbury Sea and communities is an unacceptable risk! In the interest of public safety and our unique and sensitive marine neighbors, deny	Thank you for your comment.

ID	Contact	Comment Text	Response
		Tesoro's proposed expansion. The company's track record of preventing spills is poor	
Ch13-065	Kristin Fetters-Walp	The increased traffic of tankers (and potentially trains) carrying toxic, flammable xylene through our Salisbury Sea and communities is an unacceptable risk! In the interest of public safety and our unique and sensitive marine neighbors	Thank you for your comment.
Ch13-066	Joan Poor	Please assure that the final EIS ... provides spill modeling methods and scenarios that have been developed in consultation with marine science institutions, environmental organizations, and local governments, provides comprehensive vessel traffic and spill assessment that analyzes all project cargos and propulsion fuels and all reasonably foreseeable future vessel traffic in the Salish Sea, including Canadian vessel traffic and the increase in the size of container ships calling at ports in the US and Canada.	<p>The Draft EIS discusses the results of the marine vessel spill modeling in Section 13.5.5. The methodology, assumptions, and model result figures are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B. The fate and behavior analysis of reformat and mixed xylenes in the marine environment is presented in Appendix 13-A.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan, Geographic Response Plans, and the Tesoro OSCP, which is approved by Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel's entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>Additional information regarding vessel types and modeling of vessel propulsion fuel spills is provided in Section 3.9.1 of this Final EIS.</p>

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Ch13-067	Lorraine Hartmann	Tanker traffic through these waters already inflicts severe damage to marine life at all levels, and the proposed increase, magnified exponentially with the increased danger of catastrophic spills, is unacceptable.	Thank you for your comment.
Ch13-068	Jess Wallach	As noted in the draft EIS, producing and exporting xylene will result in more tanker traffic and significantly increased spill risk.	Thank you for your comment.
Ch13-069	Jane Wentworth	<p>More tank vessel traffic will increase the risk of xylene, reformat and propulsion fuel spills. Any accident or spill could cause delays to essential ferry traffic. Most of our food is brought in to the islands every 2.5 days. A spill would result in significant and long-lasting impacts to our islands natural beauty, environmental health and fishing and tourism economies.</p> <p>The DEIS spill modeling needs to include complications from adverse weather, as required by state law.</p>	<p>Requirements for the safe transportation of mixed xylenes are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating marine transportation and spill prevention and control is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The impacts of a xylene or reformat spill are short term lasting 1-3 days. Mixed xylenes and reformat evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Additional information regarding vessel traffic, marine spill modeling (including the effects of adverse weather), spill response, and potential impacts to the ferry system is provided in Section 3.9 of this Final EIS.</p>
Ch13-070	Lynn Rabenstein	I live in Burlington and travel often to Anacortes for work. I am	The proposed project would not increase transport of crude oil by

ID	Contact	Comment Text	Response
		<p>concerned about the current impact of rail traffic and tanker traffic on the health of the Puget Sound environment and the public health of our community. My understanding is that xylene is a toxic, flammable oil product. This expansion will mean more tanker traffic through sensitive marine habitat, an increased risk of toxic spills, a rise in air pollution, and the continued threat of explosive oil trains running through our communities. I believe that the Draft EIS should address the true risks and impacts, to ensure our state and county governments are prepared to respond to the risks of this project.</p>	<p>rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>Xylenes have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS). With regards to the handling and transport of xylenes, the refinery has systems in place to properly handle these types of chemicals, prevent releases, control worker and community exposures, and respond to incidents.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Potential impacts from unplanned events, including explosions – Section 9.6 • Coordination and training of Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4.1.2 • Spill likelihood and the potential for increases in vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 • Existing oil spill response – Section 4 of Appendix 2-A <p>Human and animal exposure to xylenes or reformat can result in toxic effects if concentrations are sufficiently high (see Section 9.6.2.1 of the Draft EIS). The toxicity of xylenes and reformat to animals and humans from potential exposure during operation of the proposed project and in the event of a spill was analyzed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2

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			<ul style="list-style-type: none"> • Human health (air emissions and spills) – Sections 9.3 and 9.6.2 • Spills and information on toxicity – Chapter 13 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, spill prevention and response, and environmental health is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-071	Malia Christiansen	The Draft EIS includes a close and comprehensive look at the project’s potential impacts of increased vessel traffic in the Salish Sea, and the associated spill risk. From the analysis in the Draft EIS, it is evident that the probability of a worst-case spill is “negligible.”	Thank you for your comment.
Ch13-072	Chris OMeara Dietrich	The Salish Sea has a great amount of traffic currently. Adding ships carrying xylene certainly ups the probability of a disastrous event, which the area would struggle to recover from.	<p>Requirements for the safe transportation of mixed xylenes are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating marine transportation and spill prevention and control is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The impacts of a xylene or reformat spill are short term lasting 1-3 days. In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated</p>

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			<p>and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Additional information regarding spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-073	Luba Pekisheva	The increased vessel traffic of about 120 more bages and tankers loaded with toxic oil byproducts will result in spills and other envitonmental degredation that cannot be prevented or mitigated as proposed by Tesoro.	Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS.
Ch13-074	Swinomish Indian Tribal Community	<p>E. The DEIS Should be Revised to Characterize Baseline Vessel Traffic Conditions in the Area Between the Guemes Channel and Cherry Point (Rosario/Saddlebags/Bellingham). Both VTRA I and II reports provided analysis of baseline conditions in the Guemes/Vendovi/ Saddlebags areas based on 2005, 2010 and 2015 data.⁴ The Glosten report for the Gateway Pacific Terminal also examined baseline conditions at the Vendovi Anchorages.⁵ All studies described a high level of congestion from large vessels, support vessels, commercial and tribal fishermen and pleasure boats in the entrance to Rosario Strait south to Bird Islands, in the Guemes Channel, and in the Saddlebags Passage (Including Vendovi Island, Samish Island, and the route through outer Bellingham Bay along the west side of Lummi Island (a heavily travelled route to Cherry Point and Canada from March Point and Vendovi). Figure 3 from the Marico study, cited above, provides a full year's worth of vessel transit data in graphic form, and confirms the substantial tanker and tug vessel traffic transits through the Saddlebags/ Vendovi/Samish area to and from northern destinations. The DEIS fails to disclose the VTRA analyses of congestion and the level of risk in these areas. Both are documented in these studies and are related to the movement of the highest volumes of oil and time on the water. These studies clearly document that this area currently has the highest volumes</p>	<p>The Draft EIS analyzed baseline traffic conditions along the marine vessel transportation route and additional analysis has been included in this Final EIS. The data used from the VTRA baseline and future risk factors used to support the analysis in Chapter 13 of the Draft EIS and in Section 3.9 of this Final EIS were selected to reflect levels of congestion and associated risk in the waterways of the marine vessel transportation route. Information about Vendovi Island anchorage is included in Section 3.8.1.4 of this Final EIS. Additional information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5.</p>

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		<p>of oil and time on the water of any area in the Salish Sea. See e.g., VTRA 2010 Baseline Graphic, attached hereto as Exhibit C. As shown in this VTRA I graphic, because these areas have the greatest number of hours of oil transit on the water, baseline conditions already involve the highest baseline levels of risk for an oil spill rated in the entire VTRA study area. See Exhibit D (an updated baseline graphic from the VTRA II study work; note black and red grid cells indicating highest areas of oil spill risk). The DEIS fails to accurately describe baseline conditions and the high level of risk already associated with use of the Guemes Channel, Rosario Strait, the passage to Port Angeles, and the Vendovi anchorages. Baseline conditions should be described not only for March Point, but also the surrounding waters where the new vessels will transit and anchor. Only by accurately analyzing the baseline can the DEIS assess the direct impacts of the Xylene proposal on existing conditions. That baseline data shows that the risks to tribal and non-tribal fishermen from large vessels and their support vessels in these areas are already too high.</p>	
Ch13-075	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. The DEIS underestimates the impact that the Xylene proposal will have, both in terms of direct impacts (Xylene plus baseline conditions) and cumulative impacts (baseline plus Xylene plus other future project impacts). The Xylene project will add a substantial number of tankers, ATBs, tugs, crew transport vessels and other vessels to the water in the vicinity of March Point.</p> <p>1. Direct Impacts. The addition of hundreds of transits per year from these vessels to existing baseline conditions (even without additional future vessel traffic) in the Guemes, Rosario and Vendovi/Saddlebags area will generate direct probable significant adverse environmental impacts by increasing the baseline adverse environmental damage to the sea floor habitat for salmon and crabs, loss of access to fishing grounds by commercial and recreational fishermen, and the already-high risk of spills documented for these waterways. Adding an additional 120 plus vessel transits to this existing condition and risk constitutes is an</p>	<p>The saddlebags area (including the waterways to the east and west of Guemes Island, as well as the waters surrounding Vendovi Island) and northern Rosario Strait are not part of (and would represent a substantial deviation from) the marine vessel transportation route.</p> <p>Chapter 7 of the Draft EIS discusses impacts on marine and nearshore resources along the marine vessel transportation route. Section 3.5 of this Final EIS provides additional analysis of potential impacts to these resources. Additional information regarding direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed areas is provided in Section 3.8.1.5.</p>

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		unmitigatable probable significant adverse environmental impact.	
Ch13-076	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. The Xylene project's increases in vessel traffic will not occur in a vacuum. Under SEPA, the DEIS was required to consider the project's vessel impacts in combination with the impacts of other future project approvals within the study area. The set of background vessel traffic increases should have included all of those studied under the VTRA II study (a list compiled with the agreement of representatives of the maritime industry, the Coast Guard and Department of Ecology). The DEIS should include a comprehensive assessment of that future vessel traffic impact because, the VTRA II study determined that the March Point/Anacortes area (Guemes Channel), Rosario Strait and Saddlebags (including the Vendovi anchorages) would continue to shoulder the highest levels of oil travel on the water and the highest potential increases in oil spills over current baseline risks.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Land marine transportation – Section 13.6 <p>Additional information regarding cumulative impacts to tribal fisheries is provided in Section 3.8.1.6 of this Final EIS.</p>
Ch13-077	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (a) Anchorages. The DEIS failed to acknowledge a predicted substantial increase in ship traffic to and from Anacortes and Vendovi anchorages, as documented in recent vessel traffic studies for other agencies and projects (VTRA I and II, Glosthen/Gateway Pacific Terminal), resulting in significant cumulative impacts to these anchorage and bunkering areas. As shown in the attached minutes of the VTRA II workgroup meetings provided by the</p>	<p>Table 13-7 in Section 13.3.1.3 of the Draft EIS includes the Vendovi and Anacortes anchorage areas.</p> <p>Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and</p>

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		<p>Department of Ecology, VTRA II documented the likely increase in bunkering at Vendovi and Anacortes anchorages from future approval of projects located as far away as the Columbia River and British Columbia. Exhibit E. The Coast Guard’s proposed anchorage rule is another document the DEIS should have analyzed, because it now changes ship anchorage requirements to mandate use of designated anchorages like the Vendovi and Anacortes anchorages. Those designated anchorages are now reasonably likely to handle more ship traffic as a result of this change. The rule would now require ships over 200 feet in length to anchor in designated anchorages: b) General regulations. (1) Deep-draft vessels, including articulated tug and barge combinations, over 200 feet in length and any vessel carrying explosives, operating in the COTP Puget Sound Zone must anchor only in a designated anchorage described in paragraph (a) of this section except as may be necessary for safety or security reasons. Federal Register/Vol. 82, No. 27/Friday, February 10, 2017/Proposed Rules at 10315 – 16. The DEIS should be expanded to study the impact of the Xylene project within the Vendovi anchorage and bunkering areas, both under baseline conditions and future, cumulative conditions.</p>	<p>marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS. Additional information regarding the use of Ecology’s VTRA for the analysis of vessel traffic increase and the likelihood of an increased spill risk is provided in Section 3.9.3 of this Final EIS.</p>
Ch13-078	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (b) Future Use of the Guemes/Rosario and Saddlebags Shipping Routes. The oil spill analysis for the Guemes Channel and study area incorrectly extrapolates predictions from the VTRA II study that relate to the entire northern Salish Sea, thereby underestimating the risk of oil and fuel spills in those areas. While there is much of value in the VTRA studies statistically that does pertain to specific waterway areas, the study was never designed to provide project-level review of risk or spill probability. 6 The DEIS should have filled that gap with a more site-specific and detailed analysis of vessel traffic risk in the Guemes Channel (as well as entrance to Rosario Strait and within the Vendovi/Saddlebag area). The DEIS incorrectly summarizes VTRA II when it concludes that the majority of future vessel trips will utilize Haro Strait, and therefore when it concludes that the Tesoro Xylene project will have a negligible effect on oil spill risk within</p>	<p>The spill risk estimates in the Final VTRA (the “VTRA II,” as cited in the comment), which are incorporated into Section 13.5 of the Draft EIS, incorporate the increased vessel traffic cited in the comment, along with other factors, such as improved tanker design and navigation safety protocols.</p> <p>Consistent with SEPA, Section 13.5.5.3 of the Draft EIS analyzes the impacts of the proposed project alone (using the US232 scenario as the closest reasonably available surrogate). The “increase in ship use in the Xylene project study area from other future projects” is, by definition, a description of cumulative impacts, which are described in Section 13.6.</p> <p>The Draft EIS states that “much of the cumulative traffic would use the Haro Strait,” a statement supported by the plates cited in the comment. The southern portion of Rosario Strait and the Guemes Channel are included in the cumulative impact analysis.</p>

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		<p>the Guemes Channel. DEIS at 13-71. In fact the VTRA study indicates numbers of ships visiting the March Point area will increase significantly, including the trips from the Tesoro Anacortes Xylene project. The list of vessel increases is extensive; when combined with associated increases in bunkering, the VTRA II study predicts as many as 1700 new ports of call (one way) within the northern Puget Sound each year. These include the new Kinder Morgan tanker trips, as well as bunkering to support them. The DEIS incorrectly summarizes VTRA data on future trips (cumulative impacts) as follows: Based on the VTRA analysis of future spill risks, the proposed project’s vessel traffic increases, and the marine vessel transportation route that would be used by the proposed project, the changes in spill risks due to the proposed project do not represent a significant increase in spill risks above the risks currently present. This finding applies to the proposed marine vessel transportation route as a whole, but must also be understood in context of the individual waterways within the Salish Sea, and specifically the individual waterways within the study area of this Draft EIS. DEIS at 13-61, Section 13.5.5.3 (Marine Spills and Spill Response). This conclusion is based on a misreading of the VTRA II data on future vessel trips, compared to baseline risk in the study area. As seen in the following section, this conclusion incorrectly assumes that “the marine vessel transportation route that would be used by the proposed project” is free of significant increases in ship use in the Xylene project study area from other future projects: Chapter 13, Marine Spills and Spill Response, Section 13.5.5 found spill likelihood to be slightly higher (“low” as opposed to “negligible”) when the Guemes Channel and Rosario Strait were considered separately from the entire Salish Sea. Because much of the cumulative traffic would use the Haro Strait instead of the Guemes Channel or Rosario Strait, cumulative traffic would not increase the low spill likelihood for Guemes Channel or the Rosario Strait. DEIS at 13-71, Section 13.6 (Cumulative Impacts). The DEIS offers no data for this conclusory statement. First, as quoted previously here, VTRA disclaims any individuation of project-specific analysis and the conclusions are in terms of relative risk compared to other parts of the VTRA study area; so it</p>	<p>The saddlebags area is not part of (and would represent a substantial deviation from) the marine vessel transportation route.</p>

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		<p>is impossible to consider any segment “separately from the entire Salish Sea” as the DEIS suggests. Second, Figure 3-2 of the VTRA II study, Plates A, C and D, show that future vessel projects considered in the study will indeed use Guemes Channel, Rosario Strait and Saddlebags (see green lines in plates). [Continued on next page] [Figure 3-2. Modeled focus vessel routes for the Four What-If Scenario with bunkering support.] These plates demonstrate that cumulative ship traffic will use Rosario Strait, Saddlebags and Guemes channel, not merely Haro Strait. The DEIS analysis should be corrected to analyze the risk within those passages from interactions with Xylene project tankers, ATBs and support vessels, including cumulative ship traffic at Vendovi anchorages. As discussed above, however, VTRA did not isolate this impact or provide this analysis. Since this would be a direct impact of the Tesoro Xylene project, the omission of this vessel risk analysis did not satisfy “the rule of reason.”</p>	
Ch13-079	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (c) Future Vessel Traffic Brings a Substantial Increase in Spill Risk. The DEIS incorrectly concludes that the Xylene proposal will not significantly increase risk within the Guemes Channel or Rosario Strait, relying on selective analysis of the VTRA II results: Considering these location-specific findings along the marine vessel transportation route, there would be a low likelihood of a spill (of any scenario) in Guemes Channel and Rosario Strait. DEIS at 13-62. This conclusion contradicts data provided in the DEIS at 13-60, Table 13-27, that shows it is more likely than not (54 percent chance of occurrence) that a spill will occur in the region within the next ten years ranging from 265 gallons (6.3 barrels) to 264,180 gallons (6,290 barrels). The chance of a spill of that size range increases to 85.8 percent, for spills in a 25-year period, according to this table (derived from VTRA II predictions). 25 years represents one generation of Tribal fishers, meaning that within their lifetime there is a 86 percent statistical certainty of an oil spill within that range in their U&A, now, under baseline conditions. The Tribe does not consider this a low probability of a spill. It is not logical, therefore, to conclude that increasing the number of</p>	<p>The cumulative impacts assessment characterizes the overall change in spill risk in the study area. Additional information is provided in Section 3.9.3 of this Final EIS.</p>

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		<p>vessels, thus increasing the risk of spill, will transform this high, existing risk into the “low likelihood” cited by the DEIS. On the one hand, the DEIS attempts to deal with data in VTRA II unfavorable to the application and to dissolve concerns by citing low probabilities for other amounts of spills, and focusing on the largest size spills. The DEIS sidesteps the important analysis in VTRA II that goes to the heart of the Tribe’s concerns about future vessel traffic impacts. On the other hand, the DEIS suggests that unfavorable analysis does not exist. It states that “no other readily available information allows for a specific calculation of the probability of a spill event occurring specifically” for the project site (Guemes Channel) or Rosario. DEIS at 13-60. That is incorrect. The DEIS itself provides probability information derived from the VTRA II report for those specific areas, although it provided selective parts of the VTRA analysis, while omitting those that document a higher than average oil spill risk in this heavily traveled area. Those omitted risk statements support the Tribe’s strong concern about the increased risk of vessel traffic and its impact on natural resources important to tribal fishing. The DEIS should have included VTRA II results that show a significant increase in oil spill risk for the Guemes Channel, Rosario Strait and Saddlebags relative to other areas of the Salish Sea study area. The omission of these other results skewed the DEIS analysis in favor of the project application. Based on our review of the VTRA II text and the DEIS, we note the following deficiencies in the DEIS description of VTRA II, and flaws in the DEIS conclusion of a “low likelihood” of a spill “of any size” in the Guemes and Rosario channels:</p>	
Ch13-080	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (c) Future Vessel Traffic Brings a Substantial Increase in Spill Risk. 1. VTRA II found that, for existing conditions (Baseline 2015), the Guemes, Rosario and Saddlebags areas accounted for 38% of the oil likely to be spilled for all categories over the ten-year study period within the entire region studied by VTRA. VTRA II at 80-81, Figure 2-21. The Guemes channel ranked highest of any waterway zone. 2. The DEIS should have disclosed that for the US232 Scenario, VTRA II found a 32 percent increase of total potential oil</p>	<p>The baseline spill risk estimates in the Final VTRA (the “VTRA II,” as cited in the comment), which are incorporated into Section 13.5 of the Draft EIS, incorporate the “spill percentage” data cited in this comment, along with other factors that influence the likelihood and severity of spills.</p> <p>The saddlebags area (including the waterways to the east and west of Guemes Island, as well as the waters surrounding Vendovi Island) and northern Rosario Strait are not part of (and</p>

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		<p>loss for the northern Salish Sea, when future vessel traffic from all projects (including Xylene) were compared to 2015 baseline conditions. VTRA II at 90. 3. The DEIS also should have disclosed that this percentage increase was even higher in the Guemes, Rosario and Saddlebag channels: From Figure 3-6 one observes that the largest relative increase evaluate by the VTRA 2015 Model in the Guemes waterway zone with a relative multiplicative factor of about 2.07 . . . Thus, one observes that while overall a relative factor increase is observe of about 1.32 for the VTRA 2015 study area combined, these relative factors can be higher or lower within a particular waterway zone within the VTRA 2015 study area. 4. VTRA II found that the highest increases in potential oil loss would occur in the Guemes Channel, with high ratings as well for Rosario and Saddlebag zones: In other words, the potential oil loss evaluated in the Base Case 2015 Scenario increases within the Guemes waterway zone by about a relative multiplicative factor of 2.07 in the US232 What-If Scenario. The other water zones that experience a higher potential oil loss relative factor increase for the US232 What-if Scenario than the VTRA Study Area are the water zones Saddlebag, Buoy J, Rosario and Georgia Strait with relative factors of about 1.59, 1.44, 1.39 and 1.38 . . . respectively. VTRA II at 91. This is shown graphically in the report in Figure 3-4: [Figure 3-4. 3D Geographic profile of POTENTIAL oil loss for What-If Scenarios US232.]</p>	<p>would represent a substantial deviation from) the marine vessel transportation route.</p>
Ch13-081	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (c) Future Vessel Traffic Brings a Substantial Increase in Spill Risk. 5. The DEIS incorrectly states that this VTRA II US232 Scenario analysis did not include the Tesoro Anacortes Xylene Project: The VTRA did not evaluate how spill likelihoods would change with the addition of project-related marine vessel traffic (i.e., 120 total vessel movements per year carrying xylenes and/or reformate); however the VTRA did evaluate a scenario that included several other potential projects, generating 232 additional tanker and ATB trips from U.S. ports. . .DEIS at 13-61. The DEIS is incorrect; the listing of future projects evaluated under the VTRA II “US232” scenario (as well as the “USKMCA1600” and USKMCA12250”</p>	<p>The text as cited from the Draft EIS was incorrect and has been revised. Section 3.9.3 of this Final EIS clarifies how the VTRA was used in the analysis and that the VTRA did not evaluate how spill likelihoods would change solely with the addition of project-related marine vessel traffic (i.e., 120 total vessel movements per year carrying xylenes and/or reformate). The VTRA did evaluate a scenario that included the proposed project, along with several other potential projects, generating 232 additional tanker and ATB trips from U.S. ports.</p>

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		<p>scenarios) explicitly included ship counts for the proposed Tesoro Anacortes Xylene proposal. Thus, the results of the above comparative analysis are directly on point in reviewing this project.</p> <p>7</p>	
Ch13-082	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (c) Future Vessel Traffic Brings a Substantial Increase in Spill Risk.</p> <p>6. Based on the failure to correctly evaluate the Xylene project as one of the “US232” projects, the DEIS contains the following incomprehensible analysis: The proposed project would add approximately half as many vessels as the VTRA’s US232 scenario. Based on the information cited above, it can therefore be inferred that the proposed project would result in: • No discernible change in the overall likelihood of a worst-case spill at the wharf . . .</p>	<p>The text as cited from the Draft EIS was incorrect and has been revised. Section 3.9.3 of this Final EIS clarifies how the VTRA was used in the analysis and confirms that the US232 scenario did include the proposed project, along with several other potential projects.</p> <p>The US232 scenario would generate no discernible change in risk; therefore, the proposed project, comprising approximately half of the US232 vessel traffic, would also generate no discernible risk.</p>
Ch13-083	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (c) Future Vessel Traffic Brings a Substantial Increase in Spill Risk.</p> <p>7. On page 13-61, the DEIS lists “notable findings” from the VTRA base case findings deemed “relevant to this Draft EIS.” The listing is inaccurate because it omits the information cited above. It is also inaccurate because it misstates the conclusions of VTRA II. A comparison of the DEIS statements versus the actual VTRA II statements is as follows: [Table]</p>	<p>The text as cited from the Draft EIS was incorrect and has been revised. Section 3.9.3 of this Final EIS clarifies how the VTRA was used in the analysis.</p>
Ch13-084	Swinomish Indian Tribal Community	<p>F. Impacts From Future Vessel Traffic. 2. Cumulative Impacts. (c) Future Vessel Traffic Brings a Substantial Increase in Spill Risk.</p> <p>8. With the exception of Figure 3-10, all of the other VTRA II charts for the US232 Scenario support the conclusion that the highest risk of oil spill is in the Guemes, Rosario and Saddlebag channels, compared to other areas in the VTRA study area (with the exception of Haro Strait and Puget Sound South in some instances): ? Figure 3-8 of the report shows that for the largest spill volumes analyzed in VTRA II, the Guemes, Rosario and Saddlebag waterways all had the highest likelihood of a spill compared to any other area in the Northern Salish Sea. It also showed that the risk</p>	<p>The baseline spill risk estimates in the Final VTRA (the “VTRA II,” as cited in the comment), which are incorporated into Section 13.5 of the Draft EIS, incorporate the “spill percentage” data cited in this comment, along with other factors that influence the likelihood and severity of spills.</p> <p>As described in Chapter 13 and throughout the Draft EIS and Final EIS, xylene and reformate behave differently in the marine environment than crude oil and other substances. Neither xylene or reformates are expected to bioaccumulate or persist in the environment longer than 2 to 3 days. Spill volumes of 264 gallons or less are discussed throughout Section 13.5 of the Draft EIS.</p>

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		<p>had increased for those three areas by the highest margin, compared to baseline risk levels: [See Figure 3-8 on next page] [Figure 3-8. US232 relative comparison of probability estimate of at least one accident in a 10-year period by waterway zone for the POTENTIAL Oil Loss category 2500 m3 or more.] ? Figure 3-6 supports that conclusion by showing a total increase of 32% in oil spill loss under the US232 Scenario, within ten years, for amounts up to 1,000 meters square. The Guemes Channel accounted for 17.2% of this total increase of 32% in oil spill loss under the US232 Scenario. Guemes risk percentages increased from 16% to 33.3% (a factor of 2.07) for the ten-year period at this range. VTRA at 91; and Appendix D, Fig. D-2. ? Figure 3-11 shows a 100% probability of oil spills in the Guemes Channel within the ten-year period of 264 gallons or smaller. While the DEIS ignores these smaller spills as insignificant, Tribal fishers find them significant because repeated small spills do not typically go noticed and remain on the waterways, accumulating over time to the point they adversely affect prime habitat for crab and salmon. ? In all other charts for the US232 Scenario, Guemes, Rosario and Saddlebags scored high in the relative ranking of increased probability of spills. See Figures 3-8, 3-9, 3-11 through 3-15, at VTRA II 95-99. Given all of the errors we have pointed out in the Vessel Traffic Study, the Tribe respectfully requests that Skagit County obtain the services of an independent maritime consultant that has not worked on any of the proposed projects to objectively evaluate whether the DEIS conducted a reasonably thorough evaluation of the data from VTRA II in reaching its conclusion of no significant impact. A cursory examination of the VTRA II report shows that significant findings relevant to review of risk related to this project were not included in the DEIS or were misinterpreted. In conclusion, the DEIS analysis is incomplete. Based on the above information, the Xylene project will have a significant adverse impact on ship traffic oil/fuel spill risk in the study area due to both the Xylene projects' impacts alone considered separately from other projects, and due to the impacts of all projects together including this one, under a cumulative impacts analysis.</p>	<p>Section 3.9.2 of the Final EIS provides additional information on spill modeling.</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Land marine transportation – Section 13.6

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Ch13-085	Swinomish Indian Tribal Community	<p>G. Other Errors and Omissions of the Incomplete DEIS Vessel Traffic Analysis. In addition to the mischaracterizations of impacts and data, above, the DEIS contains other omissions that led to conclusions of no significant impacts on tribal interests. 1. Defining the DEIS Study Area. A reasonably thorough analysis of vessel traffic impacts analysis would include an analysis of increased impacts to Tribal fishing opportunities by cataloguing all vessels and all vessel routes, anchorages and bunker locations likely to be used by the Tesoro Xylene tankers within the Swinomish Usual and Accustomed fishing areas. Vessel routes out to Buoy J were utilized by the Corps of Engineers evaluating the Cherry Point Gateway Pacific Terminal and a similar expanded analysis would be appropriate here. Vessel routes to Cherry Point refineries should also be included, on both sides of the San Juans (in the event Rosario Strait is utilized as a one-way passage), and within the Saddlebags/Bellingham Bay corridor. Port Angeles serves as a major bunkering facility and should be included in the study area. Anchorages should be included and are discussed elsewhere in this comment. One addition to that comment: The DEIS analysis of anchorages is silent on the practice of using these areas to store product, at times when land-based storage facilities are at full capacity. This use is driven directly by activity within the DEIS defined study area. The DEIS analysis should be expanded to model risk and spill behavior at the anchorages used for storage and bunkering.</p>	<p>The vessel types, marine vessel transportation route, and study area analyzed in the Draft EIS are the most likely routes to and from the refinery and represent the best available information provided by Tesoro. Section 3.9.1.2 of the Final EIS provides additional detail about vessel types. Other vessel types and routes are speculative.</p> <p>Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-086	Swinomish Indian Tribal Community	<p>G. Other Errors and Omissions of the Incomplete DEIS Vessel Traffic Analysis. 2. Defining the Vessel Counts. The analysis should include all vessel traffic associated with the proposal, including support and pilot tugs, bunkering or fueling barges, and crew vessels transporting to and from anchorages, all of which contribute to potential vessel conflicts and refueling spills. Those trips should include the trips necessary to send the backhaul of gasoline blendstock described in the DEIS.8 Since publication of the VTRA II study in January 2017 (based on 2015 vessel counts), the Department of Ecology has published its VEAT numbers for</p>	<p>The Draft EIS uses 2015 VEAT data to match the 2015 vessel counts that form the basis for the spill risk modeling in the Final VTRA.</p> <p>The vessel traffic counts in Table 13-4 in the Draft EIS are the best available data (the VTRA data did not include Guemes Channel). Given the historic traffic fluctuations in Puget Sound and individual waterways such as Guemes Channel, a single year of data is not appropriate for comparison.</p> <p>Section 13.3 of the Draft EIS analyzes impacts on vessel traffic</p>

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		<p>Year 2016. The DEIS should utilize these new numbers. Of special note is the significant increase in the number of tank ships bound for Washington ports via the Strait of Georgia and Haro Strait. The 2016 VEAT shows a 200% increase over the 2015 VEAT data and sets a new historical high. These increases may be attributable to increased deliveries of aviation fuel from the March Point Shell Anacortes Refinery to Vancouver BC. Thus, the DEIS ship counts should be expanded to take into account new developments at both the March Point and Cherry Point refineries. DEIS uses a “percentage increase” in existing vessel traffic at the Tesoro Refinery. However, that percentage should be revised to include all of the support tugs, bunkering barges, and crew vessel trips that would be associated with anchoring, bunkering and loading and offloading vessels already included in the count (the 120 vessel transits). A reasonably thorough analysis of vessel traffic increases would include all of the vessel increases, because all contribute to the potential for collisions between laden tankers, ATBs or fuel barges. See DEIS Section 13.3.2. The DEIS minimizes the impact of project related vessel traffic increases in the Guemes Channel, Rosario Strait, and Saddlebags by comparing them to historical volumes of vessel traffic. DEIS at 13-15 and Table 13-9. Comparing the project increases to all vessel traffic in the Strait of Juan de Fuca results in an underestimation of localized impacts. The DEIS analysis therefore incorrectly concludes that “the marine transportation impacts from proposed project operations would be less than significant.” Id. Similarly, the DEIS analysis of impacts uses a low figure of 2.2% to describe the increase in large ship traffic generated by the proposal. The DEIS underestimates the impact of the proposed increase in 120 transits per year. It does so by using a comparison to a time period that is too long and does not reflect current conditions. Because vessel trips in the Guemes Channel have stabilized since 2000, it is appropriate to use the seven-year time period as the average. Alternatively, use of the 2014 count shown in Table 13-8 at 13-12 would be appropriate. Under this more accurate comparison, the additional 60 vessel calls at the refinery would be compared to the total of 236 vessels in 2014. This comparison offers a more realistic scale of vessel</p>	<p>(i.e., congestion and delay), separate from traffic safety and spills. Project-related vessel traffic is most appropriately compared to all other large vessels—vessels of comparable size and maneuverability, and subject to comparable navigation requirements—in study area waterways. As a result, comparing proposed project-related vessel traffic to past or recent tanker traffic associated with a single port (the refinery) is not appropriate.</p>

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		increases. Under that scale, the project represents a 25% increase over existing traffic levels.	
Ch13-087	Swinomish Indian Tribal Community	<p>G. Other Errors and Omissions of the Incomplete DEIS Vessel Traffic Analysis. 3. Analysis of Spills and Impacts. The oil spill modeling is incomplete because it failed to include realistic conditions involving spills of bunker fuels and adverse weather conditions. The modeling should include propulsion fuels. Similarly, the spill analysis assumes the only product spilled during a tanker rupture would be Xylene. Typically, chemical tankers carry multiple chemicals in the separate tanks onboard. Spills should be analyzed in terms of other chemicals that might be included on export vessels picking up Xylene from Tesoro/March Point. The DEIS' modeling for "worst-case spill" did not appear to include modeling of propulsion fuel spills, including bunker fuel which presents unique problems for oil spill responders, particularly in high winds and strong tides. See DE</p>	<p>Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Bunkering activities are described in Section 13.1 and 13.3.1.4 of the Draft EIS. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. An additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p> <p>Spill modeling, including adverse weather and propulsion fuels, is further discussed in Section 3.9.2 of this Final EIS.</p>
Ch13-088	Swinomish Indian Tribal Community	<p>III. VESSEL TRAFFIC IMPACT ANALYSIS</p> <p>A. Introduction. Based on our reading of the document, the DEIS misconstrues cited studies, selectively picks out data that is favorable to the pre-ordained conclusion of "no significant impact," and ignores data in those studies that plainly demonstrates a high level of significance within the study area. The DEIS ignores impacts to tribal fishermen in areas outside the study area. Under <i>Save v. Bothell</i>, 89 Wn.2d 862, 576 P.2d 401 (1978), Skagit County must consider the impacts of the proposed project outside of its immediate study area, even in areas the County may consider to be in adjacent jurisdictions. B. The DEIS "Study Area" Should Have Included the Vendovi Anchorages. The DEIS discussed some impacts associated with use of the Guemes Channel as part of its study area that presumably included use of the Anacortes West, Center and East anchorages. But it failed to include within the study area one of the nearby anchorage areas of highest concern to tribal fishermen: prime fishing areas where the Xylene ships and support vessels are most likely to anchor and</p>	<p>Table 13-7 in Section 13.3.1.3 of the Draft EIS includes the Vendovi anchorage area. Vendovi Island, Samish Island, and Bay are not adjacent to (and would represent a substantial deviation from) the marine vessel transportation route.</p> <p>Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p>

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		<p>bunker (refuel). The DEIS should have studied project impacts within the anchorage and bunkering areas bounded by the tip of Samish Island Channel to the south, the Vendovi Islands to the west and north, and Samish Bay to the east. The exact location of the omitted anchorages and bunkering areas are identified in the Harbor Safety Plan¹ and the proposed Coast Guard rule² described below. See Exhibit A. These are referred to collectively as the “Vendovi anchorages” or the “Vendovi anchorage area.” The Vendovi anchorage area is situated in the middle of the Swinomish Tribe’s prime king salmon and Dungeness crab fishing areas. The anchorages to be used by the project and currently used by large vessels serving March Point are located squarely within prime salmon and crab fishing grounds for the tribe’s Usual and Accustomed Fishing Area, reserved under the Treaty of Point Elliot of 1855. The DEIS should have included analysis of those anchorage and bunkering areas for two reasons: (a) use of those areas under baseline conditions already have an adverse impact on Tribal fishing opportunities; and (b) future increases in use of the areas will bring additional cumulative adverse impacts that are substantial and likely, under well documented studies and agency actions.</p>	
Ch13-089	Swinomish Indian Tribal Community	<p>C. Baseline Conditions at Vendovi Include High Level Use and Tribal Impacts. Baseline data on use of the Vendovi anchorages is readily available to the DEIS authors from the Marine Exchange of Puget Sound. Tankers and support ships serving the Tesoro March Point dock currently frequent the Vendovi anchorages for anchoring, staging, and bunkering, as well as for vessels serving the Cherry Point refineries (according to the study, these refineries will supply the Xylene project with reformat gasoline products, or receive after-product). As further evidence of baseline conditions, in recent years, Tribal fisherman have documented up to seven large tankers anchored in this area at a single time, as demonstrated in their declarations. Tribal declarations will document substantial interference with access to Usual and Accustomed fishing areas. The DEIS should also have summarized the baseline data on frequency of use of the Anacortes and Vendovi anchorages and</p>	<p>Table 13-7 in Section 13.3.1.3 of the Draft EIS includes the Vendovi and Anacortes anchorage area. Vendovi Island is not adjacent to (and would represent a substantial deviation from) the marine vessel transportation route.</p> <p>Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p>

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		<p>assessed whether use of these anchorages was increasing over time. Had the authors obtained that information from the Marine Exchange and Department of Ecology, they would have seen a clear trend of increased use of these anchorages., In fact, in the past four years the Vendovi Anchorages have now surpassed Port Angeles as the most heavily used anchorages, reaching as many as 1000 anchorages per year, in 2014 (almost 3 ships per day on average). These baseline conditions and the trend of increased use should have been described in the DEIS. The high level of use at the Vendovi Anchorages have a direct adverse effect on tribal fishing practices. The intensity of use at these anchorages has increased rapidly over the past ten years, based on the experience of tribal fishers accessing that area for decades. The DEIS should have analyzed this data and provided an assessment of direct impacts on the Swinomish treaty fishery. Tribal fishers lose access to prime fishing grounds at the Vendovi Anchorages when ships are transiting in and out of the anchorages and while ships are at anchor, typically on long anchor chains. Tribal fisherman routinely observe tankers at anchor swinging a wide circular berth in these areas, due to strong tides and winds. The Tribe commissioned a study of this anchorage use from Marico Marine, a vessel risk consultant. The attached graphic shows the areas they determined are most affected by this anchor-swing phenomena, utilizing a single year’s data at Vendovi anchorages. Exhibit B. The anchor swing diameter is estimated at 1140 meters on average (3,420 feet), more than a half a mile, as shown in the Marico study: [Id. at 9 (Figure5: Schematic of a 250m tanker at anchor in Vendovi anchorage).]</p>	
Ch13-090	Swinomish Indian Tribal Community	<p>D. Baseline Conditions Include High Levels of Bunkering Incidents at Vendovi and Anacortes Anchorages. In addition to baseline conditions involving adverse impacts to seafloor habitat from anchoring itself, the DEIS should have described the study results of impacts in the Anacortes and Vendovi Anchorages area due to bunkering spills. The Glostén Report documented a 92% probability of a spill for any given incident involving transfers to a ship, and also catalogued the rate of bunkering spills that</p>	<p>Table 13-7 in Section 13.3.1.3 of the Draft EIS includes the Vendovi and Anacortes anchorage area. Vendovi Island is not adjacent to (and would represent a substantial deviation from) the marine vessel transportation route.</p> <p>Bunkering and anchorage activities must comply with applicable provisions of federal and state regulations. Marine vessel transportation and safety in Puget Sound is administered by the</p>

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		<p>historically have occurred in anchorages in this area. Glosten researched five years of spills in the northern Puget Sound area and concluded that Anacortes and Vendovi anchorages had a substantially higher percentage of spills than any other area, with Vendovi anchorages having the largest number of incidents: Geographic Locations of Bunkering Error Incidents The locations of TS vessel bunkering incidents that occurred during 1995-2010 are in Table 6. [Table 6: Bunkering Incidents Involving VTS Vessels by Subarea 1995 - 2010] A map of the locations of the bunkering incidents is shown in Figure 1 for all vessel types and in Figure 2 for bulk carriers. [Figure 1: Locations of Bunkering Incidents, 1995-2010] The Glosten Associates, Gateway Pacific Terminal Vessel Traffic and Risk Assessment Study (Nov. 4, 2014), Appendix D at 9.3 The DEIS should disclose the fact that the Anacortes and Vendovi anchorages have the highest spill rates in the region and thus the proposal has the potential to increase the occurrence of significant and continual, cumulative spills of smaller sizes from transfers at Anacortes and Vendovi anchorages. Those smaller, continual spills have a direct adverse impact on salmon and crab habitat critical to the survival of the Tribal fishery.</p>	<p>USCG and Ecology. Additional information regarding the agencies responsible for regulating bunkering and anchoring activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS.</p>
Ch13-091	Richard Tueslerl	I am in charge or the oil spill brigade at the refinery and I believe the project will reduce the potential for spill	Thank you for your comment.
Ch13-092	Sandra Kraus	The extra ships and risk of worst-case spills and releases would be catastrophic to the area's fish, birds, mammals and other wildlife as well nearby residents.	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards</p>

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			<p>are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Impacts from the increased vessel traffic and potential spills on fish, birds, mammals, and other wildlife as well nearby residents are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Fish, mammals, and other marine wildlife – Sections 7.4 • Marine birds and terrestrial wildlife – Section 6.4 • Human health (including nearby residents) – Chapter 9
Ch13-093	Melissa Crezee	I believe the draft EIS is adequate; however, I fail to see how the potential spill impacts described can be labeled as anything other than "negligible",	<p>SEPA Rules define “significant” as something that has a reasonable likelihood of more than a moderate adverse impact on environmental quality(WAC 197-11-794). Further, an impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred. Based on the SEPA requirement to determine whether a proposal is likely to have a significant adverse environmental impact, the significance of each potential adverse impact was evaluated and then assigned to one of two categories: less than significant or potentially significant (see Section 1.7 of the Draft EIS). The potential impacts from an uncontrolled spill (i.e., no spill response), for example, were identified as being potentially significant for a worst-case spill or maximum most probable spill and less than significant for an average most probable spill.</p>
Ch13-094	Tim Colton	This upgrade would also increase the risk of industrial spills and pollution into the local environment, which cannot be tolerated.	<p>The Draft EIS analyzed impacts of the proposed project on the environment, including potential sources of pollution, and considered the management plans in place at the Tesoro Anacortes refinery, including those associated with wastewater, air emissions, and marine vessel operations.</p> <p>Emissions from new or modified sources at the refinery are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project would be required to comply with these requirements as well as</p>

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			<p>emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards.</p> <p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) administered by the Washington State Department of Ecology. The existing NPDES permit, which would be modified to accommodate the proposed project, requires that Tesoro capture stormwater that falls within the developed portion of the refinery and treat it in the refinery’s wastewater treatment plant.</p> <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes and reformates are administered by the USCG, Ecology, and the USEPA.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Additional information regarding potential impacts and mitigation measures is included in the following sections of this Final EIS:

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			<ul style="list-style-type: none"> • Air quality and climate change – Section 3.3 • Marine transportation – Section 3.9 • Mitigation measures – Chapter 4
Ch13-095	Janet Alderton	<p>Mitigations for the Increase in Vessel Traffic:</p> <p>To reduce the chances of a catastrophic spill, tug escorts should be required for all vessels, including barges and articulated tug barge units, carrying reformat and mixed xylenes.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final</p>

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Ch13-096	Rebecca Canright	I am concerned that the xylene plant will increase tanker traffic to Asia, which also raises the risk of toxic spills in the Salish Sea.	<p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-097	Louise Locke	No matter how well you plan, ACCIDENTS DO HAPPEN and the consequences would be DISASTROUS!	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and xylenes and reformat do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Spill prevention and response measures are discussed in the</p>

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			<p>following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding spill response measures is discussed in Section 3.9 of this Final EIS.</p>
Ch13-098	Rebecca Canright	The Tesoro expansion would add up to five tankers per month on Fidalgo Bay and the surrounding waters of the Salish Sea, and I am extremely worried about the risk of xylene product spills in these breathtaking and beloved waters.	<p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by</p>

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			<p>selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p>
Ch13-099	Olga Kachook	<p>Xylene production also creates yet another spill risk for the Salish Sea, and xylene tanker mishaps have caused tremendous damage in the past, such as the 2007 spill on the Mississippi River. The Tesoro expansion would add up to five tankers per month navigating Fidalgo Bay and the surroundings water of the Salish Sea.</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. The impacts from the spill on the Mississippi River are discussed further in Section 3.5 and 3.6 of this Final EIS.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-100	Maradel Gale	<p>In addition, it [xylene] is a toxic chemical, which creates dangers ...for the environment when it is spilled, which these things</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed</p>

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		inevitably are.	<p>xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS). Additional information regarding spill response regulations and responsibilities is provided in Section 3.9 of this Final EIS.</p> <p>The toxicity of xylenes to animals and humans during potential exposure during operation of the proposed project and in the event of a spill was analyzed in the Draft EIS. A discussion of the toxicity of xylene and reformat to animals and humans is discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality – Section 4.4.4 • Terrestrial wildlife, including marine birds – Section 6.4.3.3 • Marine species – Section 7.4.3.2 • Human health – Chapter 9 <p>Additional information regarding the toxicity of xylene to animals and humans is provided in Sections 3.5 and 3.6 of this Final EIS.</p> <p>The refinery’s existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided</p>

ID	Contact	Comment Text	Response
			in Table 2 in Section 3.1 of this Final EIS.
Ch13-101	Mary Sinker	Xylene is clear, odorless, and less dense than water. These characteristics make it difficult to detect and contain in the event of an accident within the refinery's manufacturing facility or from a spill in the Salish Sea.	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Xylenes do have an odor and can be smelled at a concentration of about 1 ppm. For workers, the safe daily breathing limit for xylenes is 100 ppm over a working lifetime. For the public, the safe short-term limit (less than 8 hours of exposure, as established by the National Science Academy) is 130 ppm. Therefore, the chemical can be smelled at a level that is not harmful for a short exposure, allowing people to move upwind. Additional information regarding xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The proposed project is designed with secondary containment systems to contain spills at the refinery and spill detection devices to alert workers in the event of a spill. The system was designed such that spills within the developed portions of the refinery would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's wastewater treatment plant. If the containment failed or a spill occurred outside of containment, response measures</p>

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			<p>would be implemented to control the spill to prevent impacts.</p> <p>The refinery's spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA.</p>
Ch13-102	Mary Sinker	<p>If this project moves forward, the Final EIS must include a disaster response plan that specifies all mitigation measures to be taken regarding xylene accidents or spills at either the refinery itself or from a tanker or barge in the Salish Sea.</p>	<p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding spill response regulations and responsibilities are discussed in Section 3.9 of this Final EIS. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-103	Sandra Chalk	<p>We must protect the natural riches of the Salish Sea and Puget Sound and severely limit the shipping of all products that increase the risk of a chemical spill.. Decreasing tanker traffic should be the goal of all environmental reviews.</p>	<p>Thank you for your comment.</p>

ID	Contact	Comment Text	Response
Ch13-104	Kerry	It would increase the risk of a chemical spill in the Salish Sea ...	<p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-105	Melissa Ropke	<p>There is a danger of a disaster happening to the Anacortes area and a danger of a release of severely toxic chemicals into the Salish Sea. There is already a danger from increasing vessel traffic, we cannot afford to add more.</p>	<p>The Draft EIS analyzed the likelihood of a marine spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6 of the Draft EIS. In addition, the Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-106	Robert Kutter	<p>The Salish Sea is an environmentally fragile area. Spills of either the oil used in manufacturing xylene or the xylene itself would be catastrophic to people and wildlife.</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are</p>

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			<p>flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-107	Karen Moskowitz	We cannot risk the environmental hazard of a possible chemical spill if the xylene processing expansion happens at the Tesoro Refinery.	<p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill.</p> <p>The proposed project is designed with secondary containment systems to contain spills at the refinery and spill detection devices to alert workers in the event of a spill. The system was designed such that spills within the developed portions of the refinery would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's wastewater treatment plant. If the containment failed or a spill occurred outside of containment, response measures would be implemented to control the spill to prevent impacts.</p>

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			<p>In the event of a spill to the marine environment, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>The refinery's spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA.</p> <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-108	Dennis Parent	I don't want the added tanker traffic and associated risk of transporting this xylene neurotoxin across our waters.	Thank you for your comment.
Ch13-109	Phyllis Dolph	This expansion will mean ... an increased risk of toxic spills ...	The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response

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			<p>is provided in Section 3.9 of this Final EIS.</p> <p>The refinery's spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA.</p> <p>Additional information regarding agencies responsible for regulating various aspects of the proposed project is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-110	Phyllis Dolph	Because xylene is clear, odorless, and less dense than water and so it does not dissolve in water, a xylene spill in the Salish Sea would be difficult to contain.	<p>In the event of a spill, response organizations such as those contracted by the refinery or the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Xylenes have an odor and can be smelled at a concentration of about 1 ppm. For workers, the safe daily breathing limit for xylenes is 100 ppm over a working lifetime. For the public, the safe short-term limit (less than 8 hours of exposure, as established by the National Science Academy) is 130 ppm. Therefore, the chemical can be smelled at a level that is not harmful for a short exposure, allowing people to move upwind. Additional information regarding xylenes is provided in Section 3.6 of this Final EIS.</p>

ID	Contact	Comment Text	Response
			Additional information regarding marine spill response is provided in Section 3.9.4 of this Final EIS.
Ch13-111	Dan Belcher	More tanker traffic means more likelihood of spills of the toxic petrochemical Xylene. This is an unacceptable risk, as a Xylene spill would be extremely difficult to contain as it is clear, odorless, and less dense than water.	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Xylenes have an odor and can be smelled at a concentration of about 1 ppm. For workers, the safe daily breathing limit for xylenes is 100 ppm over a working lifetime. For the public, the safe short-term limit (less than 8 hours of exposure, as established by the National Science Academy) is 130 ppm. Therefore, the chemical can be smelled at a level that is not harmful for a short exposure, allowing people to move upwind. Additional information regarding xylenes is provided in Section 3.6 of this Final EIS.</p> <p>The refinery's spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA.</p> <p>Additional information regarding agencies responsible for regulating various aspects of the proposed project is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch13-112	Kenneth Bosworth	<p>Many oil spills continue to happen around the world...no surprise as pipes, valves do malfunction as well as issues with transportation.....etc. when will we hear of total clean up? I have not heard of one yet....."oh we tried to eliminate' it and such.</p>	<p>Safety improvements and technological advances, such as independent tanks and double hulls, have helped to prevent and reduce the frequency of marine incidents.</p> <p>Mixed xylenes and reformate (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS). Xylenes and reformate do not bioaccumulate in the environment.</p>
Ch13-113	Lise Grace	<p>It [the project] also increases risk of toxic spills and pollution.</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills.</p>

ID	Contact	Comment Text	Response
			<p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-114	Melinda Mueller	<p>Given the dangers involved in transporting crude oil, in processing xylene, and past events (such as the fire at the Anacortes facility): What is the specific disaster plan, regarding a spill at the refinery or in the Salish Sea, including details of mitigation for air and water contamination?</p>	<p>The refinery’s existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill response regulations and responsibilities is provided in Section 3.9 of this Final EIS. Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are</p>

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			<p>flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p>
Ch13-115	Anne Elkins	<p>Some of my concerns are:...Effects of a spill on marine life. The fact sheet about spills states "spill impacts would last for a short period of time (up to 3 days) and affect a limited area until the chemicals evaporate and break down into harmless components (carbon dioxide and water). Until they evaporate, there is a risk of fire and toxicity to marine life due to the concentration of spilled product in the water." Our bay just went through an extensive environmental cleanup 5 years ago. By all accounts it was a success and marine life is coming back, and the bay is getting healthier. "Less than significant" risk or not, a spill could undo much of the progress we've made. A spill may be "less than significant" to the refinery, but to the marine life in our bay, it could be very significant indeed. Less than significant chances can happen, or people would never play the lottery!</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring within the marine transport route based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Additional information regarding potential impacts to terrestrial</p>

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			<p>plants and wildlife and marine and nearshore resources is provided in Sections 3.4 and 3.5 of this Final EIS.</p> <p>SEPA rules define “significant” as something that has a <i>reasonable likelihood of more than a moderate adverse impact on environmental quality</i> (WAC 197-11-794). Further, <i>an impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.</i></p> <p>Based on the SEPA requirement to determine whether a proposal is likely to have a significant adverse environmental impact, the significance of each potential adverse impact was analyzed and then assigned to one of two categories: <i>less than significant</i> or <i>potentially significant</i> (see Section 1.7 of the Draft EIS). The potential impacts from an uncontrolled spill (i.e., no spill response), for example, were identified as being potentially significant for a worst-case spill or maximum most probable spill and less than significant for an average most probable spill.</p>
Ch13-116	Gayle Janzen	<p>Xylene is clear and odorless but is extremely toxic to animals and humans who are exposed to it for any length of time. This risk alone is just too great to go forward with this disastrous proposal. Not to mention the fact that there are already too many ships going through this sensitive area as it is.</p>	<p>Xylenes have an odor and can be smelled at a concentration of about 1 ppm. For workers, the safe daily breathing limit for xylenes is 100 ppm over a working lifetime. For the public, the safe short-term limit (less than 8 hours of exposure, as established by the National Science Academy) is 130 ppm. Therefore, the chemical can be smelled at a level that is not harmful for a short exposure, allowing people to move upwind. Additional information regarding xylenes is provided in Section 3.6 of this Final EIS.</p>
Ch13-117	James Tangaro	<p>I heard comments about spill response and vessel traffic as well. After reading those sections of the draft EIS, it seems Tesoro is now and always has been very capable of responding to a spill. CPUP doesn’t significantly change the training, equipment, and planning already in place.</p>	<p>Thank you for your comment.</p>
Ch13-118	Elena Rumiantseva	<p>The plant also carried an increased spill risk: More tanker traffic means a higher risk of toxic spills. Washington state is not adequately prepared to respond to spills in the Salish Sea, which</p>	<p>The Draft EIS analyzed the likelihood of a marine spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel)</p>

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		<p>could cause irreparable damage to our sensitive marine habitat and threaten iconic species like our endangered southern resident orcas.</p>	<p>that would minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>Because xylenes are similar to other materials already transported by marine vessels, no additional specialized response equipment is required.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Potential impacts on sensitive marine habitat and wildlife, including Southern Resident killer whales, if a spill were to occur</p>

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			<p>are discussed in Chapters 6 and 7 of the Draft EIS. Additional information regarding potential impacts to marine and nearshore resources, including Southern Resident killer whales is provided in Section 3.5 of this Final EIS.</p>
Ch13-119	Barbara Gregory	Spills area inevitable.	<p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Additional information regarding agencies responsible for regulating various aspects of the proposed project is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-120	Teresa Dix	I'm also concerned about the impacts the project will have on the National Estuarine Reserve. The more water traffic means more spill risks and how will these spills be handled, is there an effective full proof way to even clean up spills.	<p>In the event of a spill, response organizations such as those contracted by the refinery or the vessel would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the</p>

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			<p>marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>The Draft EIS discusses the potential for the increases in vessel traffic to increase spill likelihood and the spill response measures at the refinery and along the marine vessel transportation route in the following sections:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of oil and hazardous substances are administered by the USCG, Ecology, and USEPA.</p> <p>Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Additional information regarding agencies responsible for regulating the safe handling and storage of oils and hazardous substances is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-121	Gretchen Rowe	I grew up on the Oregon Coast, and watched many, many, many birds die, or dead while covered in oil. We used to take some home and try to clean them in our bathtub. As children, we	Thank you for your comment.

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		thought it very sad, but we didn't know how the oil got to them. Now we do! We have other energy sources that are less harmful to our environment.	
Ch13-122	Anonymous	Although the product will supposedly evaporate rapidly in the event of a spill, the quantity of CO ₂ released is substantial, nevermind the damage to shorelines and wildlife impacted by the spill and clean up.	Thank you for your comment.
Ch13-123	George Reeves	More ships in the Salish Sea spells much greater potential to create a spill or accidents.	Thank you for your comment.
Ch13-124	Cathy Schoenberg	The possibility of a chemical spill is too much at any percentage.	Thank you for your comment.
Ch13-125	Wendy Courtemanche	I am concerned about ...potential xylene spills with risk of toxic effects on marine life.	Thank you for your comment.
Ch13-126	Wendy Courtemanche	I also ask that there be a requirement to have an adequate disaster plan in place for the event of a xylene spill...	<p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill response regulations and responsibilities is provided In Section 3.9 of this Final EIS.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget

ID	Contact	Comment Text	Response
			<p>Sound region – Figures 13-8 through 13-11</p> <ul style="list-style-type: none"> Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Ch13-127	Ron Metcalf	<p>This increase in vessel traffic has a corresponding increase in the risk of accidents and oil spills from these vessels that would transport reformate to the refinery, gasoline blendstock from the refinery, and exporting xylene to Asia. If there is a spill, the impacts to our environment, our economy, our residents and visitors- and our first responders- would be significant and unmitigable.</p>	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3. The Draft EIS also discusses the likelihood of a spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill. The likelihood of a spill occurring in the Salish Sea is discussed in Section 13.5.6, and the potential for increases in vessel traffic to increase the spill likelihood is discussed in Sections 13.5.6 and 13.6.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Spill response crews would have the appropriate training and personal protective equipment to avoid exposure to toxic materials in responding to a spill.</p> <p>Potential impacts to the environment, economy, residents,</p>

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			<p>visitors, and first responders are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Environment, including air quality, marine habitats, and marine life – Sections 4.4.4 and 7.4.3 • Human health, including first responders – Section 9.6.2 • Employment income – Section 11.5.2.4 • Tax receipts – Section 11.6.2.4 • Recreation – Section 10.4.2 • Tourism – Section 11.5.2.4 • Public services, including first responders – Section 11.4.2.4 <p>Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-128	Tom Decker	<p>Moreover, the DEIS should place more weight on environmental standards already in place such as doubled hulled tankers, escort tugs and spill response plans. These existing response blueprints, along with existing equipment, allow the region to respond readily to the shipping and product shifts outlined in the DEIS.</p>	<p>Thank you for your comment.</p>
Ch13-129	Conor Keeney	<p>I live in Anacortes. I was born and raised in the Pacific Northwest. I have an environmental science degree from Western Washington and a degree in community preparedness and disaster management from the University of North Carolina. I've worked in the industry for the last 15 years, both with government agencies, maritime transportation companies and -- it should be mentioned -- for the last year and a half with Tesoro. I do work for Tesoro, but these are comments that are my own. So, my main comment is that the increased risks and potential impacts due to a worst case discharge spill from the project are overstated in the EIS. Now, most of the impacts that we're seeing come from that worst case discharge volume. And, briefly, where that worst case discharge volume comes from are U.S. Coast Guard, Department of Ecology volumes that don't take into account prevention measures such as double hulls, segregated tanks, tag Those volumes are used to plan</p>	<p>The SEPA Rules define “significant” as something that has a <i>reasonable likelihood of more than a moderate adverse impact on environmental quality. Significance involves context and intensity and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred</i> (WAC 197-11-794). See Section 1.7 of the Draft EIS for a description of the impact assessment methodology used. The potential impacts from an uncontrolled spill (i.e., no spill response), for example, were identified as being potentially significant for a worst-case spill or maximum most probable spill and less than significant for an average most</p>

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		<p>for the response to a spill, so the plan holders need to show that they can respond to that volume. And it's not really an accurate picture of risk. So also in the model, the simulated spill of that entire 330,000 barrels -- there was no response that was initiated into that analysis. So, it's essentially just all that volume spill and the impacts were shown; that there would, in fact, be an aggressive coordinated response from many of the agencies in response -- contractors -- to that sort of spill. And, in fact, that is what the plans that are worked on go to show that you can do. In addition, mixed xylenes are a product that are currently covered by response plans and will be moved along the established transportation routes. For these factors, I don't believe the project and the associated vessel traffic will result in significant increase in current risk.</p>	<p>probable spill.</p> <p>Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-130	Janet Alderton	<p>The Draft EIS states the worst case spill from either reformate, reformate backhaul, from ARU after xylenes have been removed; or mixed xylenes would release large quantities of volatile organic chemical hazardous air pollutants, specifically mixed xylene isomers, toluene, ethylbenzene, and isopropylbenzene. That would be -- the permitted concentrations would be exceeded for up to 24 hours, based on the results of the modeling and would be a potentially significant impact. So, my ask for mitigation -- to reduce the chances of a catastrophic spill -- a tug escort should be required for all vessels, including barges in articulated tug barge units carrying reformate and mixed xylenes. And as far as responding to a spill in the best case scenario, only 15 to 20 percent of the spill is ever recovered. And in our waters that have very rapid currents and wind conditions upon occasion, the recovery rate would probably be much lower.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound</p>

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			<p>licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation, tug escorts, pilots, navigation of vessels, and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>In the event of a spill, response organizations such as those contracted by the refinery or the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.2 of the Draft EIS).</p>
Ch13-131	Janet Alderton	And as far as responding to a spill in the best case scenario, only 15 to 20 percent of the spill is ever recovered. And in our waters that have very rapid currents and wind conditions upon occasion, the recovery rate would probably be much lower.	<p>In the event of a spill, response organizations such as those contracted by the refinery and the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are</p>

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			<p>flammable, the approach to manage a xylene spill in the marine environment does not involve containing or recovering the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-132	Libby Mills	<p>I'm in agreement with our San Juan Islands speakers tonight. I support measures to reduce the risks of oil and other compounds spilling in the waters of the Padilla Bay National Estuarine Reserve, which is a bay of nationally recognized significance as a nursery for our marine ecosystem.</p>	<p>Thank you for your comment.</p>
Ch13-133	Alex Ramel	<p>I'm 15 years old, and I'm a student at Bellingham High School. So, this weekend I was spending time with my five-year-old sister. And she's asking questions left and right. She's five. And my mom's house has very old pipes, so we have to borrow water from our neighbor's water pumps. But the other day she asked me a good question. "Aden, why do we have to drink water from bottles?" And I started to think, what if in 10 years or 20 years we have to drink water from bottles not because of old pipes, but because of oil spills. Or what if she asked the question, "Why do we have to wear masks because of the air pollutants?" I don't know how to answer those questions to my sister or, in 20 years, to a child. I understand that the analysis considers small increases in oil spill risk to be insignificant.</p>	<p>SEPA Rules (WAC 197-11-440) indicate that the EIS should discuss the benefits and disadvantages of reserving for some future time the implementation of the proposal, as compared with possible approval at this time. The Draft EIS discusses the alternatives considered and the potential impact of the no action alternative in Sections ES5.1, 2.9, and Chapters 3 through 13. SEPA also directs the lead agency to consider that each generation is a trustee of the environment for succeeding generations. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal.</p> <p>The Draft EIS considers future potential impacts in the cumulative impacts analyses in Chapters 3 through 13. Cumulative impacts are changes to resources that could occur when the potential</p>

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			<p>impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals). Reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2. Resources potentially impacted by the proposed project in combination with these foreseeable future projects and actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Freshwater resources – Chapter 5 • Marine and nearshore resources, including marine waters – Section 7.7 • Land use and shoreline use – Section 10.6 • Marine transportation – Section 13.6
Ch13-134	Robin Everett	We cannot afford to spill in the Puget Sound at all.	Thank you for your comment.
Ch13-135	Anne Elkins	<p>An accident in these waters is a very real possibility considering the amount of boat traffic, ferry traffic (especially the Guemes Island Ferry), kayakers, paddle boarders and others that use these waters, and would be a very real disaster for residents, and marine life. There are residential areas on either side of the narrowest part of Guemes Channel for around a mile which could be impacted by an explosion or spill on a barge. I am aware that it has been stated that after “48 hours” the xylene has dissipated from the environment, but that is a long time for a fragile marine environment – a lot of vulnerable fish, seabirds and marine mammals can absorb a lot of toxins in 48 hours.</p>	<p>Potential impacts from unplanned events, including fire, explosion, and spills, on local residents, marine life, and vessel traffic are described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Fire or explosion and human health – Section 9.6.1 • Fire or explosion and terrestrial vegetation and wildlife – Section 6.4.3 • Spills and human health – Section 9.6.2 • Spill likelihood and response, and summary of impacts of spills on environmental resources – Section 13.5 • Marine and nearshore resources – Section 7.4.3 • Vessel traffic – Section 13.3.2.3 <p>Details about control measures and safety practices to prevent, respond, and clean up spills are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5

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			<ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Vessel safety and waterway management – Section 13.4.1.2 <p>Requirements for the safe handling, transportation, and storage of oil and hazardous substances are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating vessel traffic to prevent incidents and for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-136	Jennifer Beetem	<p>The draft EIS does not adequately address the environmental impact risks that xylene shipping and production poses to the Salish Sea environment and Washington State residents in Anacortes and the region. Frequent additional tanker traffic carrying xylene and its petrochemical precursors in the crowded commercial waters of the Salish Sea present an unacceptable risk to the marine and economic life in the region from spills. Tesoro has a spotty safety record and has resisted transparency, and Washington State simply does not have sufficient resources at present to respond to a toxic xylene spill. Xylene dissolves in water and can only dissipate by evaporation over several days, so in addition to the known health impacts on marine life and coastal residents, a xylene spill risks bottlenecking commercial shipping in the Salish Sea.</p> <p>The draft EIS also fails to include adequate disaster response plans for spills on water or land, establish safe practice standards</p>	<p>The refinery’s existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Since xylene is similar to other materials already transported by marine vessels, no additional specialized response equipment is required.</p>

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			<p>The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Additional information regarding safety practices at the refinery is provided in Section 3.6 of this Final EIS.</p>
Ch13-137	Jan Gordon	There isn't an effective way to clean up a very toxic xylene spill, just let it evaporate and breathe in the fumes	<p>In the event of a spill, response organizations such as those contracted by the refinery or the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Precautions would be taken for workers to leave the area to a location upwind of the spill. Depending on the location of a potential spill, members of residential or other populated areas located within the exclusion zone would be required to evacuate or shelter in place for a 24-hour period until the health-based air quality standards were no longer exceeded. Spill response crews would have the appropriate training and personal protective equipment to avoid exposure to toxic materials in responding to a spill event at the refinery.</p> <p>The Draft EIS discusses the potential impacts on health as a result of a xylene spill in the following sections:</p>

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			<ul style="list-style-type: none"> • Potential impacts on health from spills at the refinery – Section 9.6.2.3 • Potential impacts on health from marine spills – Section 9.6.2.4 <p>Details about control measures and safety practices to prevent and clean up spills are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts and mitigation measures from unplanned events, including spills – Section 9.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of oil and hazardous substances are administered by the USCG, Ecology, and USEPA.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation, spills, and the handling and storage of oil and hazardous materials is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-138	Jan Gordon	there are always new reports, and many more unreported, leaks, spills, explosions. This is going to keep happening and more and more land and water will remain ever polluted as it is never really cleaned up thoroughly.	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from</p>

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			<p>reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>The refinery's spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA.</p>
Ch13-139	Cheryl Harrison	I am very concerned that if there were a spill it could not be adequately dealt with in a timely manner. The Salish Sea is a very sensitive marine habitat.	<p>In the event of a spill, response organizations such as those contracted by the refinery or the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>The Draft EIS discusses the spill response measures and capabilities that would be used to protect sensitive marine habitats in the following sections:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5

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			<ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding agencies responsible for regulating the safe handling and storage of oils and hazardous substances is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-140	Cheryl Harrison	Please require that Tesoro creates a adequate disaster response plan for any potential spills at the refinery or from a tanker in the Salish Sea.	<p>The refinery’s existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill response regulations and responsibilities is provided in Section 3.9 of this Final EIS.</p> <ul style="list-style-type: none"> • Spill prevention and response measures are discussed in the following sections of the Draft EIS: • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7

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Ch13-141	Nancy Hansen	Fish cannot survive in a bay where spills are sure to occur. Spills are a documented fact for refineries, based on past history of oil pipes and spillages that happen in loading and unloading.	<p>The existing habitat and species present in the bays near the refinery are described in Section 7.3 of the Draft EIS. Potential impacts from marine spills to fishes inhabiting the nearby bays are discussed in Section 7.4.3. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record described in Section 13.5.6 of the Draft EIS.</p> <p>Additional information regarding the toxicity of xylenes to marine life is provided in Section 3.5.2 of this Final EIS.</p>
Ch13-142	Constance Snell	Maybe, we should consider who will benefit if the xylene facility is denied. ...The marine Eco-system will benefit from less pollution and potential spills.	Thank you for your comment.
Ch13-143	Evelyn Adams	I am also concerned about the potential for spills or other accidental impacts from a company with a less than stellar safety record (http://www.sightline.org/2014/07/10/the-dirt-on-tesoro/).	Thank you for your comment.
Ch13-144	Valerie Rose	Tesoro's proposal to develop and export xylene poses a grave danger to Skagit County and its residents. Since xylene is toxic, odorless and lighter than water, a spill would be nearly impossible to contain and clean up.	<p>In the event of a spill, response organizations such as those contracted by the refinery and the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Xylenes have an odor and can be smelled at a concentration of</p>

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			<p>about 1 ppm. For workers, the safe daily breathing limit for xylenes is 100 ppm over a working lifetime. For the public, the safe short-term limit (less than 8 hours of exposure, as established by the National Science Academy) is 130 ppm. Therefore, the chemical can be smelled at a level that is not harmful for a short exposure, allowing people to move upwind. Additional information regarding xylene toxicity is provided in Section 3.6 of this Final EIS.</p>
Ch13-145	Phyllis Dolph	<p>Salish Sea threats</p> <p>Because xylene is clear and less dense than — so does not dissolve in — water, a xylene spill in the Salish Sea would be difficult to contain. The only known method for tracking the chemical is via air tests. The most common method of handling a xylene spill is to simply let the chemical evaporate from surface water over the course of several days, which is what happened when a tanker carrying xylene spilled 42,000 gallons into the Mississippi River in 2007 [http://www.professionalmariner.com/February-2007/Tanker-spills-xylene-in-Mississippi-after-colliding-with-barges/]. During that time, humans and animals exposed to xylene faced serious health threats by inhaling or ingesting the chemical. (Sightline Institute) [http://www.sightline.org/2014/12/15/what-is-xylene-and-what-does-it-mean-for-puget-sound/]</p>	<p>In the event of a spill, response organizations such as those contracted by the refinery and the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p>
Ch13-146	CG Wyatt	<p>2. Xylene is a highly flammable petrochemical, which is also toxic and clear. In addition to possible fire and toxic smoke in the bay, the fact that it is clear makes it difficult to detect or clean up if spilled.</p> <p>3. As a toxic chemical, a spill in the Salish Sea could kill innumerable flora & fauna, many of which are unique to this sea.</p> <p>4. Washington state is not adequately prepared to respond to spills in the Salish Sea, which could cause irreparable damage to our sensitive marine habitat and threaten iconic species like our</p>	<p>In the event of a spill, response organizations such as those contracted by the refinery and the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable,</p>

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		endangered southern resident orcas.	<p>and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Potential impacts on sensitive marine habitat and wildlife, including Southern Resident killer whales, if a spill were to occur are discussed in Chapters 6 and 7 of the Draft EIS. Additional information regarding potential impacts to marine and nearshore resources, including Southern Resident killer whales, is provided in Section 3.5 of this Final EIS.</p>
Ch13-147	Georgianna Morgan	Will Tesoro be responsible to set aside a risk account to ensure monies are available to help the industry until the waters and sea life are restored to previous levels.	As described further in Section 3.7 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.
Ch13-148	Mary Heath	The EIS needs to explore and not minimize its acknowledgment that a worst case xylene spill could exceed the devastation of the Exxon Valdez disaster. Why would we make the choice to take that kind of risk, no matter what measures and response systems are in place?	The reference to the Exxon Valdez oil spill in Section 13.5.6 of the Draft EIS was provided to indicate how rare the size of the worst-case volume spill would be when considering the historical record. The Exxon Valdez spill was crude oil, which has very different environmental impacts from xylenes and reformate. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills (such as crude oil), no chemicals are used in the cleanup of these types of product spills and they do not leave a residue in the

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			environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).
Ch13-149	Gretchen Allison	<p>Should there be an accident with a tanker carrying Xylene there is no functional response possible to clean it up. The fumes are highly toxic and the chemical absorbs into the skin of any creature it comes into contact with. The danger to people on land and on boats and the danger to wildlife in this critical habitat for fish and Orca is an unacceptable risk.</p> <p>In the San Juan Islands where I live, our way of life would be severely impacted by an oil or chemical spill. The EIS needs to contain a study on impacts of such a spill and if it's found that there is indeed no way to protect life from dire consequences then the permit should be rejected.</p>	<p>In the event of a spill, response organizations such as those contracted by the refinery and the vessel would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p>
Ch13-150	Patrick Kirby	<p>I am very familiar with the spill response capability of local organizations. I also checked with the head of our county Department of Emergency Management, Brendan Cowan, to confirm my facts on our ability to locally respond to a xylene spill.</p> <p>The concept of tanker-loads of xylene passing through local waters is terrifying. There is no organization in San Juan County that is equipped and or trained to respond to a xylene spill. The protective clothing and breathing apparatus required to even approach a xylene spill does not exist in San Juan County. To work on a spill would require the ability to be in close proximity to evaporating xylene for many hours and possibly a few days.</p> <p>The only logical response to a xylene spill in San Juan county would be to evacuate the residents closest to the spill. Without a massive upgrade to our spill response capability, there would be no local response.</p>	<p>The Draft EIS discusses spill response capabilities in Section 13.5.7.</p> <p>The Northwest Area Contingency Plan identifies spill response coordination measures in Washington, Oregon, and Idaho. To implement the Northwest Area Contingency Plan, Ecology publishes and maintains GRPs. Prepared for individual bodies of water (or segments of a large body of water such as Puget Sound), the objectives of GRPs are to pre-identify sensitive resources at risk of injury from oil spills and to help direct response actions related to sensitive resource protection during the initial hours of a response.</p> <p>In conjunction with GRPs, caches of spill response equipment are maintained throughout the Puget Sound region. These caches are shown in the spill modeling diagrams in Figures 13-8 through 13-11.</p>

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		<p>It is absurd for Tesoro to write "sufficient existing resources (both equipment and trained personnel) are available for spill response throughout the study area"; when in fact there is no capability, personnel or equipment, to respond to a xylene spill.</p> <p>The full quote from "Tesoro Anacortes Refinery Clean Products Upgrade Project Chapter 13 Draft Environmental Impact Statement Marine Transportation"</p> <p>"If an actual spill were to occur, response measures governed by regulatory agencies and provided by the refinery, local and regional response organizations would be implemented to contain the spill and in turn minimize the potential impacts from a spill. Response plans and procedures are in place for responding to a spill and sufficient existing resources (both equipment and trained personnel) are available for spill response throughout the study area (see Section 13.5.7 and Figures 13-8 through 13-15). For example, for every spill event, booms are locally available to be rapidly deployed to protect sensitive areas and contain the spread of the material such that it would not reach sensitive areas for birds, aquatic life, or people. In the event of a spill, therefore, many of the potential impacts described above and in the other resource chapters would be further minimized below those risk levels described through the implementation of spill response"</p> <p>Please do not ship xylene in our waters and expose our land, waters, wildlife and people to this volatile and toxic product.</p>	<p>Tesoro's OSCP is written in coordination with the Northwest Area Contingency Plan and the Washington Statewide Master Oil and Hazardous Substance Spill Contingency Plan. Tesoro has an oil spill response organization certified by the USCG under contract.</p> <p>Spills in the shipping channel would be managed by the ship's crew and their contracted oil spill response organization. The contracted oil spill response organization would be responsible for deploying booms, supplying tug support (for example, to safely evacuate a crew or to provide support in the event of a steering failure), and for supporting vessel firefighting assets.</p> <p>Local (county) emergency services would likely participate in the response by assisting with evacuations and controlling ignition sources. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations). Additional information regarding spill response and capabilities is provided in Section 3.9 of this Final EIS.</p>
Ch13-151	Veronica Bush	<p>With the risk of chemical spills and little equipment to clean the spills up or even detect the substance, I ask that you please don't move forward with any expansion.</p>	<p>Thank you for your comment.</p>
Ch13-152	Veronica Bush	<p>However, if this were to happen, I do implore you to act in order to add the highest safety standards for workers to encourage no spills, and a detailed disaster response plan which includes intense mitigation for Tesoro's damage to the environment. More tanks coming through the area means a higher risk of toxic spills. There is no amount of money that is worth our oceans, wildlife, water, and</p>	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human</p>

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		air.	<p>health. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Laws, regulations, and guidance for the protection of human health – Section 9.1 <p>Additional information regarding the agencies responsible for regulating worker safety, marine transportation of hazardous materials, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-153	John Janson	just like that enormous oil release in the gulf of Mexico not too long ago, with all the very same low risk and best of preventive measures in place, something of that nature becomes a clear and present immediate danger to everything in the area affected and for years to come. all in the name of profit for a product that can better be produced and distributed in a 'safer' place or not at all. our ecosystem here is already highly endangered and threatened. none of your arguments can convince me that things will be better or even neutral when you put it all at risk with both your production and distribution of your product. who in God's world gives a company like yours to put everything at risk? tell me	Thank you for your comment.

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		<p>please. even marginally acceptable leaks, spills, contamination that are considered 'negligible or acceptable' have cumulative and compound effect on our earth and for us. to think otherwise would be as an ostrich with its head in the sand.</p>	
Ch13-154	Phyllis Dolph	<p>The DEIS does not adequately include how Tesoro would respond and pay for oil clean up after a spill and/or explosion.</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the</p>

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			<p>spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>As described further in Section 3.7 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.</p>
Ch13-155	Phyllis Dolph	<p>Is there oil now leaking into the water of our Marine Estuary? What would happen to birds, the fish, and all the flora and fauna of our Marine Estuary, if there were a catastrophic spill?</p>	<p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery's wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery's WWTP, according to the requirements of the permit. Discharges from the refinery to the surrounding waters must be monitored and must adhere to chronic and aquatic life criteria defined by Ecology. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <ul style="list-style-type: none"> Stormwater management is further described in the

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			<p>following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4 <p>Information regarding agencies responsible for stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The Draft EIS analyzed the potential impacts of a worst-case scenario spill on marine and nearshore resources, including the flora and fauna of Padilla and Fidalgo Bays. Potential impacts to birds are described in Section 6.4.3, and potential impacts to flora and fauna of the marine estuaries in the study area are described in Section 7.4.3.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating spill prevention plans and programs is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is</p>

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			provided in Section 3.9 of this Final EIS.
Ch13-156	LeeAnn Chastain	As a resident of Orcas Island, I oppose the misnamed "Clean Products Upgrade Project" in Anacortes. This project does not represent "clean" products, but will bring increased pollution, increased large vessel traffic through our very sensitive marine waters, and of course will release the extremely harmful chemical xylene into the environment in the event of any accident or improper procedure.	<p>The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.</p> <p>The Draft EIS discusses the potential impacts of the proposed project and the measures being taken to avoid or minimize potential impacts in Chapters 3 through 13. Potential impacts to marine and nearshore resources are discussed in Chapter 7 and increased vessel traffic in Chapter 13.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-157	Ross Reid	I worry that if there was a spill, Tesoro would either not be able to effectively clean the site, or their costs would be limited to certain aspects of the cleanup, leaving taxpayers and stakeholders to deal with the spillover effects.	As described further in Section 3.7 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.
Ch13-158	Ross Reid	I want to see Tesoro specifically responsible for all aspects of any kind of cleanup, making sure safety is a top priority...	As described further in Section 3.7 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations. Additional information regarding Tesoro's safety improvements is provided in Section 3.6 of this Final EIS.
Ch13-159	David M Scheer	I am very much AGAINST the pollution to the Salish Sea by the residuals of production.... PLUS, if spilled somewhere along the way, the NON-repairable, UN-fixable DAMAGE to the Salish Sea	Thank you for your comment.

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		AND to the orcas and other marine life that live there! I don't care 'how many' more jobs this activity would provide---it's NOT worth the potential WRECKAGE of these (now) pristine waters and marine environment---just ONE spill and that's it of the Salish Sea-- -PLUS the 'contamination' of same by the residual waste products!	
Ch13-160	Libby Hazen	Our communities are not equipped to deal with spills of the highly flammable product. The EIS does not adequately address these concerns.	<p>Spill response preparedness at the refinery and Salish Sea is discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Spill response and spill response plans – Section 13.5.7 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Requirements for spill response plans and local emergency response procedures and coordination – Sections 9.1 and 13.1 • Response for unplanned events – Section 9.6 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 <p>In addition to maintaining a trained fire response crew 24 hours per day 7 days per week at the refinery, Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations). Additional information regarding emergency planning is provided in Section 3.7.1 of this Final EIS. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-161	Wim Houppermans	I read parts of the Draft EIS, and what I missed was the very long-	The proposed project would be part of the larger operations of

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		<p>term plan. And "long-term," I mean 10 years from now; 15 years from now. And that's when I believe the future -- I believe the future of oil -- now it doesn't exist -- so 10 years, 15 years from now, we should be talking about cleaning up. We should be talking about what comes instead. And for that we should only be talking now. So, what I like to see in the Draft EIS is -- or the next -- the Final EIS is a section about the just transition -- how we're going to clean up, who's going to pay for it, and also why -- to make this short-term money -- we could probably do without.</p>	<p>the Tesoro refinery. The proposed project is designed for a 20-year life. However, the facility could operate for a much longer period if components are replaced when needed. Maintenance activities during operation may include daily checks of tanks, pumps, piping, and instruments. The tanks and other new infrastructure would undergo routine inspections by experienced personnel. Permit requirements that apply to project operation would remain in place for the life of the proposed project. Additional information regarding the agencies responsible for regulating the refinery is provided in Section 3.1 of this Final EIS.</p>
Ch13-162	Town of La Conner	<p>Resolution No. 531</p> <p>A RESOLUTION PROVIDING COMMENTS TO THE TESORO EIS</p> <p>Whereas, the Town of La Conner is connected to the work of the Tesoro refinery. Our community includes many who work at the valley refineries as well as those who support the work there in some capacity; and,</p> <p>Whereas, the health and safety of our community members is a high priority; and,</p> <p>Whereas, La Conner's proximity to the refinery leaves the Town vulnerable to the environmental impacts of the proposed project; and,</p> <p>Whereas, the Draft Environmental Impact Statement (DEIS) should establish high standards of care in monitoring and addressing risks of exposure to xylene for their workers as well as with managing risks in the event of community and environmental exposure with a tanker spill incident or an accident with air release of xylene; and,</p> <p>Whereas, the new xylene processing facility and the transportation issues relating material supply and product transport have separate unrelated impacts.</p> <p>NOW, THEREFORE BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF LA CONNER REQUESTS THE FOLLOWING COMMENTS BE</p>	<p>Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations). The refinery works with local emergency response agencies on a regular basis to coordinate emergency planning and response, including regular training drills. Additional information on emergency response coordination between the refinery and the local communities is provided in Section 3.7 and Appendix C of this Final EIS.</p>

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		<p>ENTERED INTO THE DEIS RECORD: ...</p> <p>Section 3: Conduct Additional Community Workshops -Within each adjacent community conduct additional workshops on Tesoro activities, emergency notification and response to a spill or emission event.</p>	
Ch13-163	Bob Hall	<p>9. Spills were not adequately covered. The analysis failed to really look at the worse possible scenerio- a spill during strong currents and/or stormy weather. Either of these could push the spilled product into eelgrass beds of Fidalgo and Padilla Bay and cause significant damage to marine resources before it could be cleaned up.</p>	<p>The Draft EIS discusses three modeled uncontrolled (i.e., no spill response) spill volume scenarios (referred to as worst-case spill, maximum most probable spill, and average most probable spill) and the spill modeling methodology in Section 13.5.4 and Appendix 13-A. Variations in the currents and winds at the modeled locations were accounted for by simulating predominant summer and winter wind speeds and directions and by simulating an annual average wind speed and direction. The spill model that was developed for the Draft EIS includes consideration of the effects of currents on the potential for spills.</p> <p>Additional information regarding spill modeling, including a discussion of adverse weather conditions during a storm event, is provided in Section 3.9 of this Final EIS. The analysis related to the potential for a spill event to occur accounts for historic spill event data in Fidalgo and Padilla Bay and includes spill events that have historically occurred in these areas (and therefore accounts for weather conditions that have occurred during the period where historic data on spill events are available).</p> <p>Potential impacts to eelgrass beds of Fidalgo and Padilla bays and other marine and nearshore resources in the event of a worst-case uncontrolled (i.e., no spill response) spill are discussed in Section 7.4 of the Draft EIS.</p> <p>Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds,</p>

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			<p>carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled materials. The Draft EIS discusses the spill response measures and capabilities that would be used to protect sensitive marine habitats in the following sections:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-164	Bryan Potter	<p>Theoretical spill scenarios are limited to only xylene and reformate. In addition, the spills are presented as occurring either on refinery grounds or within the region of the wharf where ample resources are immediately available. Some discussion of a spill within the Salish Sea is provided, but relevant details are lacking. The EIS nonetheless argues that the insolubility and volatility of xylene and reformate will limit their penetration into deeper waters while they dissipate into the atmosphere. Perhaps this may be true in those scenarios for these chemicals, but there is absolutely no mention or apparent consideration for possible spills of raw materials including sulfolane, ammonia, and perchloroethylene. No real analysis of terrestrial or aquatic spills beyond Tesoro property is provided, especially in cases involving any of these compounds. Ammonia is extremely basic and could</p>	<p>The two new process chemicals, sulfolane and aqueous ammonia, that would be used in the production of the mixed xylenes, and the quantities and transportation methods planned for the proposed project are discussed in Section 2.8.3 of the Draft EIS. The other chemicals and feedstocks used for the proposed project, including reformate, natural gas, and perchloroethylene, are routinely used at the refinery now and do not require substantive changes to existing refinery practices (see Section 2.8.4 of the Draft EIS).</p> <p>As described in Section 2.8.1 of the Draft EIS, sulfolane, ammonia, and perchloroethylene would be transported to the refinery via truck, and not via ship and therefore these compounds were not included in the marine spill modeling in Chapter 13 of the Draft</p>

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		<p>dramatically alter pH within a defined region of open or ground water thereby impacting the ecosystem. Sulfolane penetrates to the water table and does not appear to break down under normal conditions. The effects on humans and animals remain unknown but are currently being investigated by federal agencies as it relates to contaminated water supplies in Alaska.</p> <p>Perchloroethylene is classified as a probable human carcinogen, and its use in the dry cleaning industry has been banned in many countries.</p>	<p>EIS or in the aquatic toxicity analysis in Chapter 7 of the Draft EIS. Terrestrial spills of sulfolane, ammonia, and perchloroethylene off of refinery property during truck transport to the facility are discussed in Section 9.6 of the Draft EIS. The toxicity of these chemicals to humans, including the potential of carcinogenicity of perchloroethylene, are also discussed in Section 9.6 of the Draft EIS.</p> <p>Sulfolane spill prevention measures and behavior of sulfolane if spilled are discussed in Section 2.8.3.1 of the Draft EIS. Ammonia is discussed in Section 2.8.3.2.</p> <p>Requirements for the safe handling, transportation, and storage of sulfolane, aqueous ammonia, and perchloroethylene are administered by the Washington State Department of Transportation, Ecology, and DOSH. Additional information regarding the agencies responsible for regulating land transport of hazardous chemicals is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-165	Martha Hall	<p>16. Shipping accidents and spills of the products into the Salish Sea has not been realistically analyzed. The strong currents and storms have not been adequately taken into account. If conditions are "wrong" when a ship has an accident, the spill could quickly spread out into the Padilla and Fidalgo Bays, or into Rosario and beyond. Controlling the spill could be impossible until the currents and/or weather changed. Are 20 jobs worth taking this chance?</p>	<p>The Draft EIS discusses three modeled uncontrolled (i.e., no spill response) spill volume scenarios (referred to as worst-case spill, maximum most probable spill and average most probable spill) and the spill modeling methodology in Section 13.5.4 and Appendix 13-A. Variations in the currents and winds at the modeled locations were accounted for by simulating predominant summer and winter wind speeds and directions and by simulating an annual average wind speed and direction. The spill model that was developed for the Draft EIS includes consideration of the effects of currents on the potential for spills. Additional information regarding spill modeling, including adverse weather conditions during a storm event, is provided in Section 3.9.2 of this Final EIS.</p> <p>The analysis related to the potential for a spill event to occur accounts for historic spill event data in Fidalgo and Padilla Bay and includes spill events that have historically occurred in these areas (and therefore accounts for weather conditions that have</p>

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			<p>occurred during the period where historic data on spill events are available).</p> <p>Potential impacts to Padilla and Fidalgo bays and other marine and nearshore resources in the event of an uncontrolled (i.e., no spill response) spill are discussed in Chapter 7 of the Draft EIS.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize impacts. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe (see Section 13.5.7 of the Draft EIS). Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material.</p>
Ch13-166	Colin Turner	How does the history of spillages at Tesoro's dock compare with spillage history at other, similar installations nationwide?	<p>From 1999 to 2016, Tesoro recorded 11 spills at the wharf (see Section 13.5.6 of the Draft EIS). Ten of those spills were less than 1 gallon and one spill was 2 gallons. All of these recorded spills were substantially less than one barrel (42 gallons). The frequency and amount of spills over that 17 year period equate to less than one small spill event per year – so the spill history at the wharf can be characterized as infrequent, small, with less than significant impacts when accounting for the volume of spilled material and the associated containment and cleanup response.</p>
Ch13-167	Edward John McLeod	Let's forgo our next environmental superfund site and remember that most past superfund sites have never been fully remediated as promised. In the same vein, most petroleum and chemical spills have never been fully cleaned up and the resulting fines ultimately are never paid in full. Remember, your great grandchildren are going to be born onto this planet as well. As Chief Seattle once said	Thank you for your comment.

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		<p>"We didn't inherit this world from our parents, we hold it in trust for our children".</p>	
Ch13-168	Alyssa Barton	<p>The proposed project to process xylenes at the Tesoro facility will entail the use of new chemicals -- including sulfolene, aqueous ammonia, xylenes, chloroethylene, ethylbenzene, and reformates - - at the plant. The impacts of a spill of these chemicals to land or water has not been properly analyzed in the DEIS.</p>	<p>As described in Section 2.8.1 of the Draft EIS, sulfolane, ammonia, and perchloroethylene would be transported to the refinery via truck, and not via ship. Spills of sulfolane, ammonia, and perchloroethylene during truck transport to the facility are discussed in Section 9.6 of the Draft EIS.</p> <p>Requirements for the safe handling, transportation, and storage of reformat and mixed xylenes are administered by the USCG, Ecology, and USEPA Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project.</p>
Ch13-169	Fernando Yepez	<p>I've been working here in Anacortes for 15 years. I run a small business called Canflex here. We support 25 families. This business related directly with oil spill. So, I am on both sides. I am also a chemical engineer, so I understand a little bit of the science behind and also the environment because we manufacture oil spill recovery systems. I have been in many, many oil spills working; not only that, I also make equipment. And being in this community and also working along with Tesoro on many projects, I am here to support 100 percent the expansion and also the draft that the Skagit County has put together. That is because Tesoro -- well, apart from being partners for many years, we have been working together -- different drills -- along the years. They have equipment -- that they have -- that we have manufactured, that we have worked along with them to prevent oil spills. So I'm sure that whatever new oil spill standards they're going to come out, that it would be 100 percent good because that is what they have shown thus far. So, we -- we provided Tesoro with these oil spill -- oil boom [unintelligible] -- I just want to tell you a little bit of what it is -- that they actually deploy every day through -- around the ships that come over for offloading and onloading the fuel and products.</p>	<p>Thank you for your comment.</p>

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		So, they have a great oil spill response. And I'm sure that they will continue with this. So, I'm going to tell you that Tesoro is a company that is committed to protecting and respecting the environment -- the marine environment.	
Ch13-170	Anne Miller	I have several concerns about the proposed project, but I'm just going to talk about a few. First off, is that the draft of the environmental impact assessment -- in its modeling for worst case scenario spill -- it only models the vessels/cargo; and it omits propulsion fuel, bunker fuel, and modeling that would be implicated by adverse weather conditions. So I think we should require the final impact assessment to include, in their worst case spill scenario, both the spill of the entire cargo; but, additionally, the propulsion fuel and bunker fuel and what would happen in like a serious weather condition.	Additional information regarding modeling of vessel propulsion fuel spills and adverse weather is provided in Section 3.9.2 of this Final EIS.
Ch13-171	Chelsea Blank	I believe that the Draft Environmental Impact Statement needs to be revised to take a more comprehensive and closer look at some of the complex risks associated with this project. A few things that I think need more attention are the fact that the additional excessive chemicals require different methods of cleaning up	<p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project.</p> <p>The two new process chemicals, sulfolane and aqueous ammonia, that would be used in the production of the mixed xylenes, and the quantities and transportation methods planned for the proposed project are discussed in Section 2.8.3 of the Draft EIS. The other chemicals and feedstocks used for the proposed project, including reformat, natural gas, and perchloroethylene, are routinely used at the refinery now and do not require substantive changes to existing refinery practices (see Section 2.8.4 of the Draft EIS).</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-172	Lexie Bright	Tesoro's Draft Environmental Impact Statement, DEIS, has a number of deficiencies and omissions. For all of us who live in the Salish Sea, a major concern -- as previously mentioned -- is the	Additional information regarding modeling of vessel propulsion fuel spills and adverse weather is provided in Section 3.9.2 of this Final EIS. Additional information regarding spill modeling,

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		<p>proposed project's increase of tankers in transits. The DEIS includes the modeling of worse case spill oils that only include the vessel's cargo. This is not consistent with state law. RCW 90.56.010.28 defines a worst case spill, in the case of a vessel, as a spill of the entire cargo and fuel of the vessel complicated by adverse weather conditions. Propulsion fuels are not addressed in this analysis. In addition, the gasoline blendstock that would be back-hauled to the West Coast refineries that supply the reformat has also been excluded from the spill -- West Coast refineries that supply the reformat -- excluded from the spill model in the DEIS. Modeling with adverse weather conditions and modeling all products transported as cargo, including gasoline blendstock and including the ship's propulsion fuels, will demonstrate even more significant and unmitigable environmental and economic impacts. Require the Final EIS to include independent third-party verification of the spill modeling methodology, including all simulations for the specific waterways and the project proposal and whether using oil spill thickness as a basis for evaluating natural resource risk is valid. While using oil spill thickness as the basis for evaluating natural resource risk might have relevance for organisms that are sensitive to exposure via coding or the birds and fur-bearing mammals, it does not provide information for exposure rates of organisms for which inhalation, absorption, and ingestion routine of [unintelligible] exposure.</p>	<p>including a discussion of spill thickness, is provided in Section 3.9.2.5 of this Final EIS. An expanded discussion on the uncertainties around the use of a thickness threshold on the water surface as a way to assess toxicity is provided in Section 3.5 of this Final EIS. A very conservative estimate of thickness was selected to as a surrogate measure of toxicity in the absence of xylene inhalation or ingestion studies in wildlife. Inhalation, absorption, direct contact, dermal irritation, and ingestion routing of xylene exposure are discussed in Sections ES7.7, 2.8.3.1, 6.4.3, 7.4.3.2, and 13.5.4.3, Tables 6-9 and 13-29, and Appendix 13-A of the Draft EIS (also see the supporting studies listed in the reference sections).</p> <p>Skagit County hired a separate company for independent review of the modeling provided by Tesoro, and additional analysis was provided in the Draft and Final EIS documents as necessary.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan Geographic Response Plans and the Tesoro OSCP, which is approved by the Washington State Department of Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel's entire cargo. Xylenes, reformat, and reformat backhaul were included in the spill analyses. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>Additional information regarding adverse weather conditions is provided in Section 3.9 of this Final EIS. Several test simulations of spill releases under high wind speed conditions were examined during the development of the Draft EIS. These simulations showed that adverse conditions greatly reduced the impact from</p>

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			the spills due to the close proximity of shorelines at the dock and throughout the ship channel in the Salish Sea.
Ch13-173	Matthew Anderson	We should consider who will benefit if the xylene facility is denied...The marine Eco-system will benefit from less pollution and potential spills.	Thank you for your comment.
Ch13-174	Erika Davis	The clean-up of a xylene spill puts first responders at great risk, especially for the first 24 hours which is the most critical time for a clean-up operation. And as we have seen with all petrochemical spill clean-ups, they never really fully clean up, and great loss of life, health, and habitat is the consequence.	<p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Section 13.5.7 of the Draft EIS describes emergency response procedures in the event of a worst case or maximum most probable spill. Spills in the marine environment would be responded to by the oil spill response organizations described in Section 13.5.7 of the Draft EIS. Workers for these organizations (including Tesoro employees) would be trained and equipped as required by Washington State Department of Labor and Industries, which regulates all aspects of worker health and safety. Trained first responders would have the necessary personal protective equipment and have the training to evaluate what equipment is required, depending on the spill situation. In addition, multiple agencies and industries regularly engage in spill planning and spill training drills.</p> <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to</p>

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			<p>the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p>
Ch13-175	Valerie Rose	<p>The EIS must include:</p> <p>...</p> <p>3) A disaster response plan to completely contain and remove xylene from water and air, if a spill should occur at the refinery or from any shipment from Tesoro to domestic or foreign markets.</p>	<p>The refinery’s spill prevention and response plans, such as the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating response plans, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill response plans is provided in Section 3.9.4 of this Final EIS.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Ch13-176	Sue O'Donnell	<p>Because of the proposed increase in tanker traffic, the event of a “spill” from ships carrying the very explosive Xylene and witch’s brew of reformate is a potential disaster waiting to happen. I am sure “2-3 days” while waiting for spilled products to break down</p>	<p>Thank you for your comment.</p>

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		would be a lifetime for many fragile plants and sea creatures in the Padilla Bay Reserve.	
Ch13-177	David Henry	Considering that there was a huge spill in Fidalgo Bay in the 90's, how does this proposal show that accidents of that scale are going to be prevented?	<p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 <p>Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage</p>

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			<p>of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-178	Meredith Berlin	<p>it seems to me that the risk of spill is a large concern. I am concerned about residents of the area, and resident wildlife.</p>	<p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>The potential impacts to humans and animals if a spill were to occur along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine and nearshore resources – Section 7.4.3 • Human health – Section 9.6.2 <p>Washington State is prepared to respond to a spill in the Salish Sea. Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p>

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			<ul style="list-style-type: none"> • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 • Oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-179	Sharon Levine	The risk of chemical spills into our fragile environment will increase.	Thank you for your comment.
Ch13-180	Georgianna Morgan	<p>1) what measures have been put in place to eliminate or diminish the risk of xylene spills staying at the bottom of the sound like happened in Gulf. Will Tesoro include in their cleanup plans to remove this if it happens.</p> <p>https://thinkprogress.org/millions-of-gallons-of-oil-settled-at-the-bottom-of-the-gulf-after-bp-oil-spill-eabe5327e099</p>	<p>The Draft EIS discusses the behavior of mixed xylenes and reformat in the marine environment. Unlike crude oil, xylenes and reformat would not cause a viscous coating on the shoreline, vegetation, or wildlife. The surface plume from a crude oil spill may linger by floating on the water surface and may be submerged with winds and tides. Xylenes and reformat would quickly evaporate from the water surface and break down into carbon dioxide and water.</p> <p>The fate and behavior analysis of reformat and mixed xylenes in the marine environment is presented in the Draft EIS in Appendix 13-A and is summarized in Section 13.5.2 of the Draft EIS. Spill response in the event of a release of mixed xylene or reformat into the marine environment is discussed in Section 13.5.7.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and</p>

ID	Contact	Comment Text	Response
			<p>U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-181	Bob Zeigler	<p>There are two discussions of potential time product would remain in water before dissipating and impacting marine resources if spilled: 12 hours and 3 days. Even if xylene spilled into water does dissipate in 12 hours could that not take a large toll on birds, fish and marine mammals near the water surface that would interact with xylene for those 12 hours?</p>	<p>Under the worst-case spill volume, it would take 60 hours (almost three days) for 99.5 percent of the spill to evaporate. However, in most cases concentrations would be below levels that would be harmful to people or wildlife within 12 hours (see Section 13.5 of the Draft EIS). The Draft EIS discusses the potential impacts on wildlife and marine life resulting from a xylene spill in the following sections:</p> <ul style="list-style-type: none"> • Wildlife and marine birds – Section 6.4 • Marine life including fish and marine mammals – Section 7.4.2 <p>Details about control measures that would be taken to protect wildlife and marine life, including the fish and marine mammals, from spills are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Wildlife and marine life – Sections 6.4 and 7.4 • Vessel safety and waterway management – Section 13.4
Ch13-182	Christine Hansen	<p>Some of the most important living things (which we typically don't see from day to day) include the sensitive marine habitat in the San Juans and the Salish Sea. If there were to be a spill of xylene in these areas, it would go beyond those waters and make its way to the waters and shores of communities along the Strait of Juan de Fuca. More than the marine habitat in our waterways would be damaged and/or destroyed. It would indeed ruin marine habitat from Port Townsend to Neah Bay and beyond (not to mention</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material.</p>

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		adversely affecting the Puget Sound). This project is not a good idea for our communities and our state as a whole.	<p>Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate and do not bioaccumulate (see Section 13.5.7 of the Draft EIS).</p> <p>The Draft EIS discusses the spill response measures and capabilities that would be used to protect sensitive marine habitats in the following sections:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-183	Christine Hansen	Because increased tanker traffic means a higher risk of toxic spills in the San Juan Islands and Salish Sea, our resident orcas and	The Draft EIS discusses the potential impacts on wildlife and marine life resulting from a spill in the following sections:

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		<p>salmon are threatened. Washington State isn't adequately prepared to respond to these kinds of spills in the Salish Sea. I strongly recommend that the DEIS include a detailed study of how our marine habitat (as well as all affected communities, including those on land) would be damaged in the event of such a spill where our various state organizations could not adequately respond due to preparedness issues.</p>	<ul style="list-style-type: none"> • Wildlife and marine birds – Section 6.4 • Marine life including fish and marine mammals (including salmon and Southern Resident killer whales) – Section 7.4.2 <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>Spill prevention and response measures and available spill response resources are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil

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			<p>spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The refinery’s existing spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the piloting of vessels, and spill prevention and control is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-184	Julia Hurd	<p>The proposed xylene plant is very near one of the state's premiere shoreline protected areas - Padilla Bay - and a spill would wreak havoc; recovery would take a long while, longer than in a high tide, rocky area. In the event of a spill, will we be prepared? This is a new product.</p>	<p>Potential impacts on shoreline areas, including Padilla Bay, in the event of a spill are analyzed in the Draft EIS. The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-185	Marylee Chamberlain	I'm most concerned about ... any environmental impacts that might be a result of a spill.	<p>The Draft EIS discusses the potential environmental impacts of the proposed project in the event of a spill in Chapters 3, 4, 5, 6, 7, 10, and 13.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A Vessel safety and waterway management – Section 13.4 Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>

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Ch13-186	Kimberly Sims	The potential risks from this plant far outweigh the benefits. ANY spill of this toxic chemical into the waters of Puget Sound would have catastrophic consequences on marine life, air quality, beaches, soil, ground water, birds and humans.	Thank you for your comment.
Ch13-187	Michael Devirian	<p>Any accident or spill from project vessels could cause delays to essential ferry traffic.</p> <p>Any spill from project vessels could cause impacts to recreational boaters, fishers, and whale watchers.</p> <p>A project vessel spill would result in significant and long-lasting impacts to our islands' natural beauty and tourism economy.</p> <p>The DEIS spill modeling did not include all the project cargos or any propulsion fuels or complications from adverse weather conditions — as required by state law.</p>	<p>The Draft EIS discusses the increase in vessel traffic as a result of the proposed project in Section 13.3. The potential impacts resulting from increased marine vessel traffic, including ferry traffic and recreational boaters in the Salish Sea, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Land and shoreline use, recreation and views, including recreational boating and whale watching – Sections 10.3.2, 10.4, and 10.5.2 • Vessel traffic, including ferry traffic, vessel safety, and marine spills and spill response – Sections 13.3.1, 13.3.2, 13.4.2, and 13.5 • Economics/employment income – Section 11.5 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, impacts to ferries, adverse weather, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-188	Ronna Loerch	2. Certainly, the potential for increased oil spills has been covered but not adequately addressed in this draft EIS.	The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. The potential for increases in vessel traffic to increase spill likelihood is discussed

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			<p>in Section 13.5.6.</p> <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-189	Ronna Loerch	2. There must be a clear, coherent and implementable disaster response plan in this EIS.	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Laws, regulations, and guidance for the protection of human

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			<p>health – Section 9.1</p> <p>The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating worker safety, spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS. Information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-190	Jim lombard	<p>Third: The spill modeling is inadequate.</p> <p>Solution: Spill modeling methods and scenarios should be developed with consultation with marine science institutions, environmental organizations, and local government. These models must include complications from adverse weather conditions as per state law requirements.</p>	<p>The Draft EIS discusses the results of the marine vessel spill modeling in Section 13.5.5. The methodology, assumptions, and model result figures are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B. The fate and behavior analysis of reformate and mixed xylenes in the marine environment is presented in Appendix 13-A.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan Geographic Response Plans and the Tesoro OSCP, which is approved by the Washington State Department of Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel’s entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p>

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			<p>Skagit County hired a separate company for independent review of the modeling provided by Tesoro, and additional analysis was provided in the Draft and Final EIS documents as necessary.</p> <p>Additional information regarding the effects of adverse weather on spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-191	Helen Moran	<p>Environmental impacts identified in the draft EIS: ...Increased spill risk: More tanker traffic means a higher risk of toxic spills. Washington state is not adequately prepared to respond to spills in the Salish Sea, which could cause irreparable damage to our sensitive marine habitat and threaten iconic species like our endangered southern resident orcas.</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The potential for increases in vessel traffic to increase spill likelihood are discussed in Section 13.5.6 of the Draft EIS. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5.</p> <p>The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine and nearshore resources, including sensitive marine habitat and Southern Resident killer whales – Sections 7.4.2 and 7.4.3 • Land and shoreline use, recreation, and visual resources – Sections 10.3.2, 10.4.2, and 10.5.2 • Vessel traffic , vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 • The Draft EIS discusses spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill in the following sections: • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Construction site controls and operational site controls at the

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			<p>refinery and wharf – Section 2.7.6 and Section 2.8.5</p> <ul style="list-style-type: none"> Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A Vessel safety and waterway management – Section 13.4 <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-192	Sara Holahan	<p>ES7.11.3 Spills Although we all hopeful there would never be a spill, we must anticipate such incidents. They would be devastating for wildlife, especially endangered salmon. The EIS says xylene does not bioaccumulate in fish but, a study from the Agency for Toxic Substances has found 50-120 ppb in fish. (Toxicological Profile for Xylene August 1995 Update Agency for Toxic Substances and Disease Registry U.S. Dept. of Health and Human Services). The EIS continues to say there “could” be impacts, when it is clear that it “would” have impacts for sure. Worse yet, it says the modeled assumption is that “no response actions” are required. Xylene evaporates quickly creating a terrible impact to air quality for several days and nothing can be done to mitigate the harm to humans, not to mention wildlife.</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize the potential impacts in the event of a spill.</p> <p>The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The refinery’s SPCC Plans would be modified to accommodate the proposed project. Requirements for the safe handling and</p>

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			<p>storage of mixed xylenes at the refinery are administered by Ecology and USEPA. Laws, regulations, and guidance for safe handling, storage, and pollution prevention are described in Section 3.1 and 5.1 of the Draft EIS.</p> <p>The potential impacts if a spill were to occur at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Geologic resources, including soils – Section 3.3.2.3 • Air quality and greenhouse gas – Section 4.4.4.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Human health – Section 9.6.2 • Land and shoreline use – Section 10.3.2 <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>

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			<p>The spill modeling section of the Draft EIS and Appendix 13-A states that spill response was not included in the modeling, not that it would not be required. Since spill response efforts were not included in the modeling, the estimated potential impact results are conservatively high, or in other words, worse than would be expected if spill response measures were utilized.</p> <p>Additional information on the potential impacts to wildlife from a spill of xylene is included in Section 3.5.2 of this Final EIS. Potential impacts on human health are discussed in Section 3.5.2 and treaty rights are discussed in Section 3.8 of this Final EIS.</p>
Ch13-193	Phyllis Dolph	<p>Skagit County should include language in the final EIS that:</p> <p>...</p> <ul style="list-style-type: none"> • Creates an adequate disaster response plan with mitigation measures for water and air during a xylene spill at the refinery or from a tanker in the Salish Sea. 	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Laws, regulations, and guidance for the protection of human health – Section 9.1

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			<p>The refinery's existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating worker safety, spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS. Information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-194	Becky Kilpatrick	<p>As a resident of the San Juan Islands I wish to comment on the proposed project to make Xylene at the Anacortes refinery and then ship it through the narrow passages of the Salish Sea. This highly volatile, hazardous and toxic petrochemical should not be manufactured in our region nor shipped through our waters. The increase in tanker traffic alone would increase the chance of an oil spill or worse yet a Xylene spill that there is no way to clean up. If there were an oil spill it would not only threaten our fragile waters , endanger the already threatened populations of the resident Orca, and salmon and have a large and long lasting economic impact on this areas main industry, tourism.</p>	Thank you for your comment.
Ch13-195	John Carrier	<p>Xylene is a powerful organic solvent. Let's not be swayed by arguments that Xylene spills are not as long lasting as heavy oil spills.</p>	Thank you for your comment.
Ch13-196	Janice Flinn	<p>A xylene spill will impact our air, water, and land. It will also damage other highly susceptible marine animal populations. How is this a good return on our investment to live and work in such a beautiful place. The potential environmental impact and cost is huge.</p>	Thank you for your comment.

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Ch13-197	Lisa Nash Lawrence	If there is an accident or spill it would be detrimental to every living creature here, our cultural heritage, our fishing, tourist, scientific, real estate industries, as well as a financial burden presently and for our future generations.	Thank you for your comment.
Ch13-198	Mary Manous	... shipment of the product [Xylene] to Asia in five tankers per month increases the risks of spills such as happened in 2007 on the Mississippi River.	Thank you for your comment.
Ch13-199	Deborah Rudnick	In particular, the EIS needs to include: -Adequate and specific plans for a spill response: this document must address how a xylene spill at the refinery or from a vessel would be addressed and mitigated.	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Laws, regulations, and guidance for the protection of human health – Section 9.1 <p>The refinery's existing spill prevention and response plans,</p>

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			including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating worker safety, spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS. Information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-200	Jeffrey Jacobs	Tesoro should post a bond that would compensate for any potential disaster, including litigation, on the scale of Exxon Valdez.	As described further in Section 3.7 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.
Ch13-201	Suzanne Myers	A xylene spill would devastate our marine ecosystem along with the danger to people: boaters, ferry passengers, and in general the pristine marine environment.	Thank you for your comment.
Ch13-202	Jenny Weinstein	Not to mention the potential for a chemical spill.	Thank you for your comment.
Ch13-203	Elisabeth Robson	The DEIS spill modeling did not include many of the impacts a potential spill due to adverse weather conditions would cause.	Additional information regarding spill modeling, including adverse weather, is provided in Section 3.9.2 in this Final EIS.
Ch13-204	Elisabeth Robson	A xylene spill could cause severe air quality impacts to the surrounding area, as well as server water quality impacts.	Thank you for your comment.
Ch13-205	Glen Bruels	I have a lot of problems with both the proposed project and the draft EIS. As with any other risk management consideration, the trade must be made between the likelihood of a situation occurring and the potential impact if it does occur. If I understand	Thank you for your comment.

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		<p>the proposed project, the biggest risk is not associated with the initial goal (removing further sulfur content in gasoline), but rather from creating a new business line associated with producing and shipping mixed xylenes. And that risk exists throughout the entire process — the need to ship additional toxic chemicals on our only major roadway to the area (pre-production), vapor emissions in a relatively heavily populated area (production and loading), and potential spills (including vaporization back into the air). The question is — does the potential profit associated with xylene production really offset the potentially disastrous effects at all stages of xylene production and distribution? In short, I believe the answer is an absolute “no.”</p>	
Ch13-206	Skagit Audubon Society, Timothy Manns	<p>5. The modeling of spill scenarios is too limited to confidently draw a conclusion that impacts would be of no significance.</p> <p>We appreciate that models were run to predict the spread and duration of mixed xylenes or reformat in the environment in the event of a spill. However, as all modeling, that done for the present project has its limits. Those limitations should be prominently noted in the EIS and should strongly condition the conclusions drawn. The spill scenarios model only average tides, not the maximums and minimums which might present very different results. Also, in the wind conditions included in the model, the maximum scenario was 10 mph, while in winter there are days when the winds at March Point, for example, can certainly be stronger. And that is the season when large numbers of birds are on the bays and potentially downwind of a spill.</p> <p>In Appendix 13-A: (“Fate and Behavior Analysis in the Marine Environment: Reformat and Mixed Xylenes”) we read that the model used to predict the spread of a spill cannot directly model for the behavior of mixed xylenes or reformat. Gasoline, which has similarities but is chemically different, is therefore used as a surrogate, deemed by the contractor preparing this report as similar enough chemically (p.12). The graph on page 13 gives an impression of what the difference can mean. It shows, for example, that with zero wind, after 16 hours, 87% of the volume of</p>	<p>Additional information about the spill scenarios performed and effects of adverse weather conditions in spill modeling is included in Section 3.9.2 of this Final EIS.</p> <p>Modeling was performed on spring and neap tides, not average tide conditions. Use of gasoline as a surrogate is slightly under conservative (in that gasoline may evaporate slightly quicker than xylene or reformat) for GNOME™ modeling of reformat and mixed xylenes. However, the use of the next available option, kerosene/jet fuel, would cause a much greater deviation as a surrogate, requiring up to nine days or more for near complete evaporation. When using gasoline as a surrogate, the steepness of the evaporation rate is greater. However, the time to reach the endpoint of near 100 percent evaporation is similar: two days versus two and a half days. The results from the ADIOS2 analysis were included in the discussion and the conclusions of the risk analysis. Had the actual evaporation rate of xylene been available as an option to select in the GNOME™ model, the difference between the evaporation rates would have created a minimal difference in the trajectory estimates and the overall conclusions of the impact assessment would have been identical to those reported based on the sensitivity of the model to this parameter and the relatively small difference in values for this parameter between gasoline and xylene.</p>

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		<p>spilled gasoline will have evaporated but only 50% of xylene or reformate. The behaviors of gasoline versus xylenes and reformate would, therefore, appear to be quite different with significant implications for length of exposure by people and wildlife and for total area of spread. We request that the final EIS present the results of an evaluation by an outside expert on the validity of using gasoline as a surrogate for xylenes and reformate in this modeling.</p> <p>In the discussion of the modeling we were also struck that the “worst case discharge” (WCD) modeled for the dock location is 5,045 barrels, far less than the capacity of either an articulated tug barge or a typical tanker (330,000 barrels). The text further states that discharge would likely not be all at once, but take place over time. The duration of the discharge, therefore, should also be considered in calculating the distance of spread and the duration of exposure by people and wildlife. The models do not appear to do this. Also, why would the total quantity of discharge necessarily end so far short of the vessel’s capacity? Presumably, crews would immediately work to stop the discharge from continuing, but what if that presented unforeseen difficulties and delays?</p> <p>A few years ago, several of us participated in a workshop to inform citizens about the Geographic Response Plans prepared by Department of Ecology (DOE). Presenters included staff from the Shell and BP refineries, the U.S. Coast Guard, and DOE. One of the exercises involved implementing the plan for the Padilla and Fidalgo Bays in the case of an imaginary spill at a March Point refinery dock. The projection of spill spread came from a model used in such events and showed rapid movement well into Padilla and Fidalgo bays. It is striking that none of the modeling scenarios in the Appendix 13-A study show the potential for this type of movement of spilled material.</p> <p>For the final EIS an outside expert should evaluate the validity of the modeling that uses gasoline as a surrogate for mixed xylenes and reformate. The final EIS must fully and clearly describe the limitations of the modeling presented in Appendix 13-A and</p>	<p>It is difficult to comment on comparisons between another spill modeling study recalled in the vicinity and the ones presented in this report. Simulations can vary greatly depending on the type of oil or chemical spilled, volume assumed, release rate, depth of release, hydrodynamic and meteorological conditions, and location of the release.</p>

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		modify the related conclusions expressed at various points in the EIS to indicate a justifiable level of confidence.	
Ch13-207	Amy Mower	The Final EIS must include requirements for the State to have a scientifically determined best practices spill team, spill response equipment and boats, and to require that such a spill response team, and its equipment and boats, is fully funded for as long as there is tanker traffic in the Salish Sea.	<p>The Draft EIS discusses spill response in Section 13.5.7. Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-208	Tulalip Tribes, Kurt Nelson	In addition, impacts could include loss or changes to habitat and water quality through spills that could impact fish and shellfish. Depending on the degree of these impacts, treaty resources, traditional lifeways, health, and the culture of the Tulalip Tribes could be adversely affected due to degradation of their fisheries.	<p>The existing habitat and species present in the bays near the refinery are described in detail in Section 7.3 of the Draft EIS. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record (see Section 13.5.6). Potential impacts from marine spills to fishes inhabiting the nearby bays and tribal fisheries are discussed in Sections 7.4.3 and 11.5.1.5 respectively.</p> <p>Information regarding the agencies responsible for marine and nearshore resources and spill prevention is provided in Table 2 in Section 3.1 of this Final EIS. Xylene toxicity to marine birds and aquatic life is further discussed in Section 3.5.2 of this Final EIS.</p> <p>Additional analysis of marine vessel anchorages is included in Section 3.8.1.4 of this Final EIS. Additional information regarding</p>

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			<p>direct impacts from increased marine vessel use, spills, and reduced access to tribal usual and accustomed fishing areas is provided in Section 3.8.1.5. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-209	Sandy Robson	<p>Because xylene is less dense than (so does not dissolve in) water, then humans and animals are particularly prone to being impacted by a xylene spill on land or in the Salish Sea.</p>	<p>Thank you for your comment.</p>
Ch13-210	Sandy Robson	<p>More tanker traffic means a higher risk of toxic spills. Washington state is not adequately prepared to respond to spills in the Salish Sea, which could potentially cause irreparable damage to the sensitive marine habitat as well as threatening iconic and important species such as the endangered and federally protected southern resident killer whales (orcas).</p>	<p>The potential for increases in vessel traffic to increase spill risks is discussed in Section 13.5.6. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The Draft EIS discusses the potential impacts of increased marine vessel traffic, vessel noise, and marine spills on marine wildlife, including Southern Resident killer whales, in Section 7.4. Potential impacts of xylene and reformate to human health in the event of a spill are discussed in Section 9.6.2.</p> <p>Vessel safety and waterway management is discussed in Section 13.4.1.2 of the Draft EIS.</p> <p>Requirements for the safe marine transportation of mixed xylenes are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding agencies responsible for regulating marine vessel transits, the protection of Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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			<p>Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Marine transportation, including spill likelihood and response, is further discussed in Section 3.9 of this Final EIS.</p>
Ch13-211	Sandy Robson	<p>Create an adequate disaster response plan with mitigation measures for water and air during a xylene spill at the refinery or from a tanker in the Salish Sea</p>	<p>The refinery’s spill prevention and response plans, such as the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Laws, regulations, and guidance about safe handling and storage at the refinery are described in Section 3.1 and for marine transportation are described in Section 13.1 of the Draft EIS.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel</p>

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			fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-212	Anne Winkes	<p>The FEIS must analyze the actual risk of a spill occurring within Guemes Channel.</p> <p>Each additional vessel will increase the risk of an oil spill or xylene spill into the channel with subsequent distribution by tidal action into the Fidalgo Bay Aquatic Reserve and the Padilla Bay National Estuarine Research Reserve, both of which provide the majority of the nutrition needed by the Great Blue Heron throughout the breeding season. The damage from such spills could be catastrophic to the Great Blue Heron.</p> <p>The DEIS concludes “A worst-case or maximum most probable spill could have unavoidable significant impacts for humans, marine birds, and aquatic life.” It fails to mention the impact on wading birds, like Great Blue Heron, who feed on aquatic life. The final EIS must correct that omission and analyze the impact on Great Blue Heron.</p>	<p>The Draft EIS notes the relative increase in vessel traffic for the various locations of the marine vessel transportation route in Sections 3.3.1, 13.3.2.2, and Table 13-9. The potential for increases in vessel traffic to increase spill risks is discussed in Section 13.5.6.</p> <p>The Draft EIS discusses spill likelihood and the results of the marine vessel spill modeling in Sections 13.5.5 and 13.5.6. The methodology, assumptions, and model result figures of scenarios for uncontrolled spills are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B.</p> <p>The fate and behavior analysis of reformate and mixed xylenes in the marine environment is presented in Appendix 13-A.</p> <p>Spill modeling is further discussed in Section 3.9.2 of this Final EIS.</p> <p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would not be expected to result in an increase in human activity in the vicinity of the heronry.</p> <p>The potential impacts and control measures related to xylene production are discussed in the following sections:</p> <ul style="list-style-type: none"> • Terrestrial wildlife impacts – Section 6.4.3 • Spills at the refinery – Section 6.4.3.2

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			<ul style="list-style-type: none"> Spills to the marine environment – Section 6.4.3.3 <p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level. Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS. Additional information regarding agencies responsible for regulating listed species, marine and nearshore resources and, terrestrial wildlife, including marine birds, is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-213	Anne Winkes	<p>The DEIS states that “In the modeled worst-case spill scenario for locations along the marine vessel transportation route, the area potentially affected under this scenario was estimated to be up to 23.5 square miles of surface water, and up to 11.5 miles of shoreline. The thickness of the floating spilled material immediately after the release was estimated to be 10 µm or more, and the thickness reduced to less than 0.1 µm within 2 days as the material dispersed and evaporated. Modeling indicated that 99.5 percent of spilled material evaporated or dissipated within 3 days of the spill, leaving no persistent residue.” Again, the DEIS does not address the impact on Great Blue Heron who may be feeding along the shoreline during the three days when the spilled material may still be present. The final EIS must address the adverse impacts on Great Blue Heron whose food source during those three days may</p>	<p>The Draft EIS analyzed the potential impacts to birds from construction and operation of the proposed project. The analysis included consideration of great blue herons and the March Point Heronry. Spill modeling demonstrates spilled xylene and reformate would not be expected to impact the terrestrial environment where the March Point Heronry is located but could temporarily affect potential heron foraging habitat, depending on the location of a spill. Xylene and reformate are rapidly metabolized and excreted from tissues, so, if a spill did occur, these materials would be unlikely to bioaccumulate in the food sources or the tissue of great blue herons. The proposed project would not be expected to result in an increase in human activity in the vicinity of the heronry.</p>

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		have persistent residue.	
Ch13-214	Washington Physicians for Social Responsibility, Bruce Amundson, Emily Peterson, Laura Skelton	<p>Any increase in vessel traffic means an increased spill risk, and more tanker traffic means a higher risk of toxic spills. Xylene is difficult to contain after a spill because it is colorless and floats on water. It evaporates quickly, but area workers are unprotected from acute health effects. Short-term exposure to high levels of xylene may cause irritation of the nose and throat, nausea, vomiting, and neurological effects. Long-term exposure at high levels may affect the nervous system. After a tanker collision on the Mississippi River in 2007, 42,000 gallons of xylene were released into the river. Twenty dock workers in the area were hospitalized for respiratory symptoms, and another 10 workers at a nearby facility reported health effects from the spill. The final EIS should require all project related laden tank vessels be escorted by tug(s) of sufficient power and maneuverability to increase the safety of transit through the Salish Sea east of Port Angeles and limit spill risk.</p>	<p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The likelihood of a spill occurring in the Salish Sea is discussed in Section 13.5.6. A summary of potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5.8 of the Draft EIS. Cumulative impacts from marine transportation including vessel traffic, vessel safety, and spill risks are discussed in Section 13.6.</p> <p>The proposed project includes the transport of xylenes and reformate using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene</p>

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			<p>and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>
Ch13-215	Washington State Department of Ecology, Meg Bommarito, Yvonne Kicken	3. Tesoro's Oil Spill Contingency Plan required under WAC 173-182 will need to be updated to include the new tanks that may be used to store petroleum products. This must be completed prior to their use. Please ensure this is noted in the Final EIS.	The refinery's existing spill prevention and response plans, including the spill prevention and control plan for new tanks, secondary containment, and spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Information regarding agencies responsible for permitting and overseeing these plans is provided in Table 2 in Section 3.1 of this Final EIS.
Ch13-216	Anacortes Chamber of Commerce, Stephanie Hamilton	The additional marine traffic associated with this project is minimal and the products to be shipped are similar in characteristics to the products already transported through the Salish Sea. Because of these similarities, the spill response plans and equipment are easily modified to cover the new product this project with create.	Thank you for your comment.
Ch13-217	Pilchuck Audubon Society, Allen Gibbs	Some of our work occurs in the Skagit River and Samish River deltas. These are among our highly popular wildlife viewing areas, with decades of citizen science observations of birds making these areas their temporary and permanent homes in the Pacific Flyway. We are among many Audubon societies to enjoy wildlife watching	Thank you for your comment

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		<p>in these deltas and estuaries of Fidalgo and Padilla bays. March Point industrial activities are of ceaseless interest to us.</p> <p>We are much concerned about the future environmental health of these areas, flora and fauna, upon notice about Tesoro's latest proposal pertaining to its Anacortes refinery and production of xylene. Our concern is about potential spills of xylene and reformates spills in the vicinity of the refinery site, and marine transportation of xylene and associated production materials through Fidalgo and Padilla bays and the Strait of Juan de Fuca.</p> <p>Tesoro acknowledges spillage will be harmful to avian and other wildlife in the vicinity of the refinery. We are especially concerned about this addition to an array of hazardous chemicals already used in the refinery's operation.</p>	
Ch13-218	Pilchuck Audubon Society, Allen Gibbs	<p>It is bad enough given lack of preparedness on the part of Canadian and British Columbia governments in case of spills, based on recent examples in English Bay out from Stanley Park in Vancouver, but also too meager Washington State and US government spill response capacity. The current situation is worsened by Tesoro's expansion to include reformates import and xylene export tanker traffic!</p> <p>Tesoro must be required to make substantial financial commitments to costs of spill prevention and costs of mitigation and remediation of such spills by ground, water and air.</p>	<p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are reduced to a safe level. Additional information regarding toxicity of xylenes to marine birds and aquatic life is discussed in Section 3.5.2 of this Final EIS.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p>

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			<ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessels, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9, and additional information regarding fuel leaks is provided in Section 3.9.2.1 of this Final EIS.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>Costs associated with cleaning up spills and paying damages to those that have been harmed by a spill are covered under federal regulations. As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.</p>
Ch13-219	Pilchuck Audubon Society, Allen Gibbs	<p>We join with fellow citizens in asking you to do the following:</p> <p>...</p> <p>2. Create an adequate disaster response plan with mitigation measures for water and air during a xylene spill at the refinery,</p>	<p>The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Information regarding agencies responsible for permitting and overseeing</p>

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		whether from a tanker on the Salish Sea or rail.	<p>these plans is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessels, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9, and additional information regarding fuel leaks is provided in Section 3.9.2.1 of this Final EIS.</p>
Ch13-220	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter,	And the risk of risks of petrochemical and bunker fuel spills appear to be both more likely and the consequences more severe than indicated in the DEIS.	Bunkering activities are described in Section 13.1 and 13.3.1.4 of the Draft EIS. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology. Additional information regarding the agencies responsible for bunkering activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS. Spill modeling, including adverse weather conditions and propulsion fuels, is further discussed in Section 3.9.2 of this Final EIS.

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	Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge		
Ch13-221	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>Include RCW 90.56.010 (28) in Table 131: Relevant Laws, Regulations, and Guidance for Marine Transportation</p> <p>Under RCW 90.56.010 (28) "Worst case spill" means: (a) In the case of a vessel, a spill of the entire cargo and fuel of the vessel complicated by adverse weather conditions." This definition was inappropriately excluded from consideration in Table 131.</p> <p>Throughout the analysis, the spill modeling included in the DEIS omits propulsion fuel, including bunker fuel, and omits modeling worst case spill volumes complicated by adverse weather conditions</p> <p>Address impacts to land use and shoreline use from spills of all project related vessel cargos and propulsion fuels</p> <p>Chapter 10 addresses spills from project vessels, claiming that the short duration of the spill – until the product evaporates – and the claim that no residue would remain – results in “less than significant impacts” on shoreline use including recreational activities and aesthetics and visual resources. This analysis is flawed because it excludes spills from propulsion fuels, which include bunker fuel, or gasoline blendstock (that would be backhauled to the other west coast refineries that supply the reformat).</p> <p>The duration of a worst case spill volume that includes propulsion fuels, including bunker fuel, will last far longer than 3 days. NOAA’s description of bunker fuel (see http://response.restoration.noaa.gov/oilandchemicalspills/oilspills/oiltypes.html):</p> <ul style="list-style-type: none"> • Little or no evaporation or dissolution. 	<p>The definition of the worst-case scenario used for the marine spill modeling was the federal definition for the amount of cargo on board a vessel (33 CFR 154.1020 and 33 CFR 155.1020. These are the amounts that would be changed as a result of the loading and unloading of xylenes or reformat as part of the proposed project. Spill modeling, including adverse weather and propulsion fuels, is further discussed in Section 3.9.2 in this Final EIS. This section of the Final EIS states that “Analysis of fuel spills was not included in this study because vessel fuel spills are not a unique feature of this proposed project. Vessel fuel spills have already been modeled in detail in previous risk assessments performed in the Salish Sea for Ecology (French-McCay et al. 2005) and the range of scenarios modeled would account for any new marine vessel traffic associated with the proposed project.”</p> <p>The Draft EIS discusses the results of the marine vessel spill modeling in Section 13.5.5. The methodology, assumptions, and model result figures of scenarios for uncontrolled spills are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B.</p>

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		<ul style="list-style-type: none"> • Heavy contamination of intertidal areas likely. • Severe impacts to waterfowl and furbearing mammals (coating and ingestion). • Longterm contamination of sediments possible. • Weathers very slowly. • Shoreline cleanup difficult under all conditions. <p>The FEIS should be revised to recognize and address the risks to shorelines and land use from potential spills of all fuels.</p>	
Ch13-222	Tesoro Anacortes Refinery, Rebecca Spurling	<p>On the whole, Tesoro generally agrees with the conclusions, summarized at ES-34 through ES-38, that the CPUP has no unavoidable significant adverse impacts following mitigation. With one exception, related to a correction to the County's conclusion regarding worst case or maximum most probable spill that is discussed in detail below, Tesoro believes that Skagit County's conclusions in this table are very well supported by the analysis and evidence described throughout the DE IS.</p>	Thank you for your comment.
Ch13-223	Tesoro Anacortes Refinery, Rebecca Spurling	<p>Tesoro submits this letter, to assist Skagit County in clarifying the analysis of impacts from the CPUP, particularly in the following areas:</p> <ul style="list-style-type: none"> • A "worst case" spill is neither likely nor probable, and, even if one occurred, would have less impact than described in the DE IS. • A "maximum most probable" spill is similarly not probable, and, even if one occurred, would have less impact than described in the DEIS. 	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill (see Sections ES7.11.4 and 13.5.6).</p> <p>Spill likelihood is further discussed in Section 3.9.3 of this Final EIS.</p>
Ch13-224	Tesoro Anacortes Refinery, Rebecca Spurling	<p>C. A "Worst-Case" Spill is Neither Likely Nor Probable.</p> <p>We support Skagit County's conclusions that the impacts from CPUP-related spills would have less than significant impact on the environment. These conclusions are well supported by the detailed analysis in the DEIS and its appendices. We do have concerns about a few areas that were addressed in a manner that overstates the potential impact from any spills that might occur. As</p>	<p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the analysis of impacts in each of the resource chapters. The SEPA Rules provide direction to the lead agency for preparing an EIS</p>

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		<p>a consequence, the DEIS overstates the potential environmental consequences to both the aquatic and human environments if such a spill were to occur.</p> <p>It is important to recognize that a "worst-case" spill is neither likely nor probable as defined by SEPA rules. This is true both as a matter of statistical probability as well a physical reality. In addition, based on science and the record, a worst-case spill, in the remote chance that it were to occur, would not have a "more than moderate" impact on the environment.</p> <p>1. WCD is derived from spill response planning regulations, not from actual events.</p> <p>In order to understand the likelihood of a worst-case discharge (WCD)¹⁰ spill (330,000 barrels in this case), it is important to understand the basis for the WCD concept. WCD comes from federal regulations that govern spill response planning and help assure adequate preparedness in the event of an incident.</p> <p>Just because these quantities are used in spill response planning does not mean that they represent a likely occurrence. The WCD concept is used for staging and storage of adequate spill response equipment, to guide spill response exercises to test and train response personnel, and to ensure that there will be proper and effective response in the case of a real event. The WCD federal regulations provide more than adequate protection to respond to a real event, which will almost certainly be much smaller than the WCD used in training exercises. The WCD concept should not be used as a proxy for a real event. As the DE IS acknowledges, a 330,000 bbl spill is 38 times larger than the largest recorded spill in the Salish Sea.¹¹</p> <p>2. Only 30 percent of CPUP vessels are physically capable of a WCD.</p> <p>A critical physical reality that reduces the likelihood of a WCD is the capacity of the vessels that will serve the CPUP. In order for a spill the size of the WCD to occur, it would be necessary for a vessel to be carrying that much product. The vast majority of</p>	<p>that includes an analysis of reasonable alternatives and probable adverse environmental impacts that are significant. SEPA defines "significant" as something that has a reasonable likelihood of more than a moderate adverse impact on environmental quality (WAC 197-11-794). Further, an impact may be significant if its chance of occurrence is not great but the resulting environmental impact would be severe if it occurred.</p> <p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill (see Sections ES7.11.4 and 13.5.6).</p> <p>Spill likelihood is further discussed in Section 3.9.3 of this Final EIS.</p> <p>The spill modeling section of the Draft EIS and Appendix 13-A states that spill response was not included in the modeling. Since spill response efforts were not included in the modeling, the estimated potential impact results are conservatively high, or in other words, worse than would be expected if spill response measures were utilized.</p> <p>Vessel types and traffic are further discussed in Section 3.9.1 of this Final EIS.</p> <p>The Draft EIS discusses double-hull vessel design in ES7.1.2, Table ES-2, and Appendix 13-A. Vessel types and traffic are further discussed in Section 3.9.1 of this Final EIS.</p> <p>Spill prevention and response requirements, plans, training, inspections, and equipment are further discussed in Section 3.9 of this Final EIS.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG VTS maintains positive control of incoming and outgoing tankships as described in Section 13.3.1.1. In addition to the VTS, the Draft EIS discusses the policies, procedures, and organizations that manage safety and operations in the waterways within the study area in Section</p>

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		<p>vessels {70 percent}¹² that will call at Tesoro for the CPUP project will be articulated tug barges (ATBs), which have a capacity of about 180,000 barrels (bbl) and are physically incapable of a WCD event. 30 percent of CPUP vessels would carry 330,000 bbl.</p> <p>3. Even vessels theoretically capable of WCD have protections that prevent WCD.</p> <p>The CPUP vessels are designed not to spill all of their contents, as would be required in a WCD event. Vessels carrying CPUP related cargo must have double hulls. Double hull design on average reduces the size of oils spill by 20% and 62% in tank barge and tanker ships accidents, respectively.¹³ In addition, and perhaps just as critical, all CPUP tankers and ATBs are compartmentalized internally into many smaller tanks. A WCD would require that all of these individual compartments (forward and aft, starboard and port side) simultaneously rupture.</p> <p>The improbability of this occurring and the spill prevention power of compartmentalization is best illustrated by the Exxon Valdez accident, in which about 250,000 bbl of crude was released.¹⁴ Unlike CPUP vessels, the Exxon Valdez was a single hull tanker. If the Exxon Valdez had been a double hulled tanker, the amount spilled likely would have been about 62% less. Even though it was single hulled, the Exxon Valdez spilled only about 17 percent of the crude oil it was carrying because it was compartmentalized (as all CPUP vessels will be). Beyond the miniscule increase in spill risk from CPUP tanker traffic documented in Section C.S, below, there is an even more extremely remote likelihood of all the compartments of a double hulled CPUP tanker being simultaneously penetrated in an incident.</p> <p>4. Vessel safety systems, training, and procedures also prevent WCD.</p> <p>As the DE IS describes, ships traversing the Salish Sea operate under a comprehensive system of vessel traffic management creating a safety net unsurpassed in the world.¹⁵ These systems include¹⁶:</p>	<p>13.4.1.2, including tanker prohibitions, pilot and escort tug requirements, traffic separation, rescue tug, safety zones, security zones and other requirements. During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>

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		<p>1. Traffic Separation</p> <p>2. Cooperative Vessel Traffic Service</p> <p>3. Automatic Identification Systems</p> <p>4. Closed circuit TV monitoring of critical passages</p> <p>5. Special Operating Areas and Precautionary Areas</p> <p>6. Regulated Navigations Areas</p> <p>7. Safety and Security Zones</p> <p>8. Required Pilotage</p> <p>These systems all work together to mitigate the likelihood of any spill even further beyond the many other factors presented here. They should be incorporated into the analysis in the FEIS.¹⁷</p> <p>5. Vessel spill risk studies of the Salish Sea confirm that WCD from a CPUP vessel is, at best, theoretical.</p> <p>The 2015 VTRA prepared for Ecology¹⁸ presents the most current and comprehensive risk of all size spills in the Salish Sea."¹⁹ The 2015 VTRA calculated the risk of spills or discharges from six scenarios of vessel traffic in the Salish Sea. One scenario was "Baseline" from which changes in spill risk from each scenario were calculated. The other five scenarios included various arrays of potential projects that could generate additional vessel traffic. The 2015 VTRA broke down these spill risks by the size of the potential spill ranging from small spills (less than 6.3 bbl) to large spills (more than 15,725 bbl).²⁰ The WCD discussed in the DEIS would be larger than the "large" spill modeled in the 2015 VTRA.</p> <p>The 2015 VTRA quantified risk of large spills for existing (Baseline) vessel traffic.</p> <p>The baseline likelihood of a large spill in any given year is 0.01% or 1 in 10,000 probability.²¹</p> <p>The baseline likelihood of a large spill in the next 25 years is 1.24% or 1.24 in 100 probability.²²</p>	

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		<p>The baseline likelihood of a large spill in the next 10 years along the CPUP vessel routes were also calculated by the 2015 VTRA, and are broken down by area are shown in Table 1.</p> <p>[Table 1. 2015 VTRA Baseline Probability Estimate of a Large Spill in the Next 10 Years Along CPUP Vessel Route]</p> <p>The VTRA 2015 also modeled "what-If" scenarios to assess the changes in spill risk with additional vessel traffic. The "what-If" scenario US232 included the Tesoro CPUP project. Tesoro CPUP represented 60 (or 26%) of the 232 vessel calls modeled in the US232 "what-If" scenario. The likelihood of a large spill in the next 10 years along the CPUP vessel routes in the US232 scenario are shown in Table 2.</p> <p>[Table 2. 2015 VTRA What-If Scenario US232 Probability Estimate of a Large Spill in the Next 20 Years Along CPUP Vessel Route]</p> <p>Because CPUP vessel traffic in the US232 What-If scenario represents only 26 percent of the change in vessel traffic modeled, only 26 percent of the change in large spill risk can be attributed to CPUP vessel traffic.</p> <p>Further, when considering the WCD scenario, only 18 CPUP tankers of the 232 vessels modeled in US232 scenario (or 7.76%) would be carrying enough cargo to potentially spill the WCD. Therefore the change in large spill risk at the scale of the WCD is small fraction of an already statistically low probability event. Table 3 presents the amount of change in large spill probability estimate attributable to CPUP tankers using VTRA 2105 data.</p> <p>[Table 3. Change in Large Spill Probability due to CPUP Tankers in the Next 10 Years Along CPUP Vessel Route based on 2015 VTRA What-If-Scenario US232]</p> <p>Table 3 documents the miniscule change in spill probability estimates due to CPUP tanker traffic- the only CPUP vessels that could theoretically generate a WCD. The change in spill probability ranges from 5 ten thousandths of a percent to 1 one hundredth of a percent. Such small changes in potential impact do not meet the standards set by SEPA for a "probable" or "likely" impact. Further,</p>	

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		<p>such miniscule changes in spill probability attributable to CPUP tankers would be events that are improbable and very unlikely to occur during the life of the project except as an extreme deviation from normal operating conditions.</p> <p>As noted above, the 2015 VTRA used actual spill data over the last 26 years to create the models and scenarios contained in the report. This has several implications for the spill size estimates. The record of spills includes single hull vessels that are no longer allowed. This has the effect of overstating the likely size of a spill event today. In fact, as noted in the 2015 VTRA, "double hull design on average reduces the size of oils spill by 20% and 62% in tank barge and tanker ships accidents, respectively."²⁵</p> <p>Using actual data and records the 2015 VTRA estimates that the average size of a "large" spill would be about 42,758 bbl. A WCD of 330,000 bbl would be nearly eight times the average large spill in the 2015 VTRA and would constitute an event that is improbable and would be an extreme deviation from normal.</p> <p>The likelihood of a WCD is remote to virtually impossible and therefore under SEPA does not represent a probable significant adverse impact. This conclusion is consistent with the findings of the DEIS- " ... the proposed project's vessel traffic increases, and the marine vessel traffic route that would be used by the proposed project, the changes in spill risks due to the proposed project do not represent a significant increase in spill risks above the risks currently present."²⁶</p> <p>D. Consequences of WCD of Mixed Xylenes Are Overstated in the DEIS In addition to likelihood considerations described above, the FEIS should include an analysis of the following factors when describing potential impacts for a spill:</p> <ul style="list-style-type: none"> • Mandatory spill response mitigation measures, • Appropriate characterization of the hazards presented by mixed xylenes, • Comparison of xylene to more harmful chemicals when projecting impacts, 	

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		<ul style="list-style-type: none"> • Accurately describing the reported acute effects of xylene slick thickness and water column concentrations, and • Incorporating evidence that an actual spill of xylenes did not impact aquatic life in a measurable or observable way.²⁷ <p>When considered together, these factors will more accurately reflect the impact of a potential xylene spill on the environment. The FE IS would be strengthened in its analysis and accuracy by including or clarifying these points.</p> <p>1. Mandated Spill Response Would Mitigate any Spill</p> <p>A WCD spill is not only extremely unlikely, the environmental consequences analyzed in the DE IS do not consider spill response measures. We understand that the models used to forecast spill behavior do not allow for spill response inputs. Nonetheless, the consequences of a spill in a realistic scenario, if one were to occur, would be significantly mitigated by the response that would occur. This should be made explicit and clear in the FE IS. In other words, if the virtually impossible WCD were to occur, the modeled results would likely be an overestimate of extent and exposure. This is because a massive, sophisticated and well-trained response would be deployed to protect the public health and safety as well as sensitive environmental features. Response measures will have a meaningful effect on a spill and the FE IS should account for mitigating effects of required spill response.</p> <p>2. Mixed Xylenes Present a Minor Hazard</p> <p>The DE IS overstates the adverse effects of mixed xylenes by utilizing as a proxy the reported effects for crude and other black oils, which are more harmful than xylene. MAR POL, the International Convention for the Prevention of Pollution from Ships, 1973 as modified by the Protocol of 1978, classifies mixed xylenes as a MARPOL Category Z pollution risk in MAR POL Annex II, which is the lowest of three regulated pollution categories and presents a "minor hazard":</p> <p>Category Z: Noxious Liquid Substances which, if discharged into the sea from tank cleaning or deballasting operations. are deemed to</p>	

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		<p>present a minor hazard to either marine resources or human health and therefore justify less stringent restrictions on the quality and quantity of the discharge into the marine environment [emphasis added].</p> <p>Crude oil and other black oils, by contrast, are addressed in Annex I of MAR POL and are treated very differently than xylenes.</p> <p>3. Oil is not an appropriate surrogate for mixed xylene impacts.</p> <p>Mixed xylenes behave very differently and are therefore classified separately than crude oil and other oils such as bunker fuel. It is important for the FE IS to account for these differences. A spill of mixed xylenes would evaporate and dissipate in a manner of hours (60 hours at most²⁸), and also spread over comparatively smaller areas (from less than 0.2 square mile to less than 24 square miles).²⁹</p> <p>The use of oil as a surrogate for mixed xylenes to assess potential impacts to marine organisms such as birds, turtles and mammals is not supported by the existing literature and knowledge of mixed xylene and reformate characteristics. Crude oil has determinate effects associated with persistence, high molecular weight carcinogenic components and hypothermia effects on marine birds and mammals. But crude oil is not similar to xylene or reformate.³⁰ There is little literature for xylene or reformate thickness and effects, but it is known that the evaporation and lack of persistence will have much less of an effect on a birds' ability to thermoregulate and not result in the same level of adverse effects. Using other more persistent and toxic oils such as crude oil as a surrogate leads to an overstatement of potential adverse environmental consequences. The FE IS should acknowledge this.</p> <p>4. Oil Slick Thickness for Impacts is not Supported by Science</p> <p>In addition to the use of more persistent and toxic surrogates for biological effects assumptions in the DEIS, the use of Oil slick thickness as a threshold of adverse impacts due to xylene exposure is also not supported by the existing literature documenting environmental consequences of oil spills. One of the articles cited</p>	

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		<p>in the DE IS 31 explains a threshold thickness for oil effects to wildlife, citing as authority reports³² that concluded that 10-25 1-1m (of oil) that could impart a lethal dose to some interacting wildlife, and from this concludes that the threshold for effects of oil should be 11-1m.</p> <p>But the DE IS uses an arbitrary and unsupported thickness of 0.11m, which is two orders of magnitude (100 times) lower than the literature-cited values for reported effects of oil, which is a much more deleterious liquid. The threshold of 11m slick thickness was the minimum cutoff used within biological effects models used in assessments by the National Oceanic and Atmospheric Administration (NOAA) of black oil.^{33 • 34 • 35} This threshold may itself be overstated, by already lowering the reported acute threshold of the much more persistent and adverse effects of oil compared to xylenes by an order of magnitude. The DEIS compounds this by unaccountably and without supporting evidence lowering the 1 ~m threshold for other oil even further, by another order of magnitude, to 0.1 ~m. The FE IS should use threshold for biological effects established in the literature and used by NOAA of 1 ~m as the measure for assessing the exposure area and effects pathways of mixed xylenes. Given that this number is considered the appropriate threshold for more toxic and persistent substances, using 1 ~m as the threshold for mixed xylene will still overstate the impact and result in a more than adequate analysis of impacts.</p> <p>5. Presumed Water Column Concentrations Overstate Impacts</p> <p>The DEIS also uses a dissolved concentration of xylenes within the water column to estimate potential effects to marine species (fish and invertebrates) of 2.6 mg/L as a threshold of acute effects in the spill plume. The DE IS correctly points out these effects, if they occur, would be limited to the first few feet of the water column surface for only several days in the WCD. However, there are additional factors that are important to consider when assessing the acute effects of dissolved xylenes.</p> <p>First, given the demonstrated short period of time that spilled</p>	

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		<p>xylenes would remain in the water column, only acute, not chronic or long-term, effects would occur. Given this, literature review suggests a value of no less than 2.6 mg/L represents a threshold of possible effects of sensitive receptors.</p> <p>This 2.6 mg/L concentration was shown to have an effect on juvenile life stages of more sensitive receptors such as salmon fry within a closed laboratory setting (aquarium). This means that the 2.6 mg/L threshold was developed in an artificial setting that did not have the dynamic hydraulic, wave and wind actions that exist in the Salish Sea. In addition, CPUP's mixed xylenes will be comprised of multiple components, each having a different sub-lethal concentration threshold. For example, p-xylene has a sub-lethal threshold of 2.6 mg/L while m-xylene's is 8.4 mg/L and o-xylene's is 7.6 mg/L.³⁸ Therefore, in the event of a spill of mixed xylenes the actual sub-lethal effect would be more than 2.6 mg/L and less than 8.4 mg/L if the Salish Sea was a closed laboratory setting such as an aquarium where these values were derived.</p> <p>A more realistic basis for acute effects would be to apply values from moving water experiments that more closely resemble the actual conditions in the Salish Sea. The threshold value within a flow-through experimental environment (moving water) that more closely resembles the natural conditions of the offshore environment when xylenes might be present during a spill was 17.3 mg/L³⁹, a value nearly 7 times higher than the threshold used in the DEIS.</p> <p>The FEIS should acknowledge that the concentrations being used are 1) conservative for potential chronic effects, and 2) would not occur given the rapid evaporation and dissipation of xylenes.</p> <p>6. The Consequences of a WCD spill would not Result in a More than Moderate Impact on the Environment</p> <p>Due to the very different nature of mixed xylenes and reformate from oils, limited geographic extent of a potential spill, rapid dissipation, limited exposure through the water column, and overstated acute and chronic effects, the potential adverse effects</p>	

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		<p>from a WCD do not meet the significance standards of WAC 197-11-795.</p> <p>Based on the analysis, we recommend that the FEIS be modified to clarify that:</p> <ol style="list-style-type: none"> 1. The WCD is an unlikely event and physically improbable due to modern ship construction; nonetheless it is a legal planning requirement for oil spill contingency plans. 2. The risk of vessel incidents and spills of any size is indistinguishable between the project and the no action alternative. 3. Mixed xylenes are listed by international marine pollution regulation as producing "minor harm" if discharged comparatively very different than most other oils. 4. Mixed xylenes and reformate are light products that will not spread or persist longer than a few days and only in the top several meters of the water column. 5. In the unlikely event of a spill, levels protective of humans and marine life would be achieved very quickly. 6. Because of the low likelihood of occurrence and the low level of impact of any event, the impacts of a worst-case response planning spill are also not significant. <p>E. An Actual Xylene Spill in the Mississippi River Had No Significant Impact The FEIS should consider in its analysis any discussion of the only reported mixed xylene spills (a spill of over 42,000 gallons (1,000 bbls) of mixed xylenes in the Mississippi River in 2003). That spill dissipated quickly and with no reported fish kills, a fact consistent with and predicted by these comments and in the DE IS. The Natural Resource Damage Assessment trustees, including the state and federal environmental agencies, did not pursue determination of injuries to natural resources or claims for natural resource injuries.⁴⁰</p> <p>F. Impacts from a Maximum Most Probable Spill are Not Significant</p>	

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		<p>The FEIS should clarify that there are no significant impacts from a "Maximum Most Probable Discharge" (MMPD) spill event (i.e. a discharge of 2,500 bbl41). The same analysis that has been presented regarding a potential WCD would apply to a MMPD event and result in the same conclusion; there is no probable significant adverse impact as a result of CPUP vessel traffic.</p> <p>1. A MMPD spill event is Not Probable</p> <p>As with the WCD scenario the following facts apply:</p> <ol style="list-style-type: none"> 1. MMPD is a response planning tool mandated by 33CFR 155.1020. 2. A MMPD would also be classified as a "large" spill by the 2015 VTRA (greater than 15,275 bbl). 3. Vessels included in MMPD spill scenarios (tankers and ATBs) have built in protections to prevent a MMP event. 4. Vessel safety systems, training and procedures mitigate against a MMPD spill event. <p>2. CPUP Vessel Traffic does not Change the Likelihood of a MMPD event.</p> <p>As with the Large Spill scenario, the 2015 VTRA calculated the likelihood of a spill within the size range of a MMPD event. It also calculated the change in likelihood of such a spill under the US232 What-If Scenario that includes the CPUP project. The results of this analysis demonstrate that CPUP vessel traffic would create no change in the risk of a spill the size of a MMPD event along 3 of the 4 portions of CPUP vessel traffic routes. For the one portion of the route (Guemes Channel), the change is spill probability is one tenth of a percent, as shown in Table 4.</p> <p>[Table 4. Change in Spill Probability of 6.3 to 6,290 bbls due to CPUP Tankers in the Next 10 Years Along CPUP Vessel Route based on 2015 VTRA What-If Scenario US232]</p> <p>3. The Consequences of a MMPD would not Result in a More than Moderate Impact on the Environment An MMPD would have the</p>	

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		<p>same physical and chemical properties as WCD except that it would be about 0.75% the size. Therefore, it would dissipate much more quickly, spread over smaller areas, result in less dissolved product in the water column and overall have much less adverse environmental consequences. Thus, an MMP discharge would not have a probable significant adverse impact on the environment.</p>	
Ch13-225	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Worst Case Spills Must Include Propulsion Fuel</p> <p>RCW 90.56.010 defines "Worst case spill" to means "(a) In the case of a vessel, a spill of the entire cargo and fuel of the vessel complicated by adverse weather conditions."</p> <p>On page 1334 the DEIS uses a definition that is not consistent with state law, "The "worstcase scenario" spill refers to a spill of ... 330,000 bbl (the entire contents of a tank ship cargo of mixed xylene...)" This incorrectly excludes the vessel's propulsion fuel. The FEIS should correct this error. The FEIS should model spills of all project related vessel fuel products, including bunker fuel that would be used by the tankers exporting xylene to Asia. The FEIS modeling should also include the risk of spill of the "gasoline blendstock [that] would then be backhauled to the original refinery that supplied that reformat feedstock" (section 2.8.2. Marine Vessel Traffic, page 240) and all variations in reformat.</p> <p>Worst Case Spills May Not be Instantaneous</p> <p>Section 13.3.2.3. Impacts on Vessel Traffic from Spills and Spill Response only addresses a spill and response with a maximum duration of three days. The section should address longer periods of time that would be associated with spill release scenarios other than an instantaneous release. The assumption that an instantaneous release represents the worstcase scenario, is not necessarily valid or representational. Appendix 13a Section 4.2.2 states "These large spill scenarios (e.g. thousands and hundreds-of-thousands of barrels) are highly improbable and would likely occur over time; a number of hours or perhaps days" The FEIS should explore scenarios with a full range of representative release scenarios complicated by adverse weather conditions to determine</p>	<p>Additional information regarding spill modeling, including adverse weather and propulsion fuels, is provided in Section 3.9.2 of this Final EIS.</p> <p>Additional information regarding non-instantaneous spills is provided in Section 3.9.2 of this Final EIS.</p> <p>Tesoro hired Polaris to compile the map and currents and winds that comprise the GNOME™ North Puget Sound location file. The North Puget Sound location file was created specifically for Tesoro's proposed project using data on bathymetry, weather, currents, and shoreline attributes specific to the marine vessel transportation route and the wharf.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan, Geographic Response Plans, and the Tesoro OSCP, which is approved by Ecology and the USCG (see Appendix 13-A of the Draft EIS). Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155-1020 and include the worst-case discharge, which means a discharge of a vessel's entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (Appendix 13-A of the Draft EIS). This study was included as an appendix to the Draft EIS. Additional descriptive material or supporting documentation may be placed in appendices or in separate documents at the discretion of the lead agency (WAC 197-11-425(5)).</p>

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		<p>if they result in longer water column and atmospheric exposure of natural resources and humans to xylene and reformate.</p> <p>The FEIS should also address delays associated with salvage operations necessary to address a vessel casualty. Salvage operations could last days, weeks or months. Salvage could be delayed due to weather, worker safety concerns associated with VOCs, or equipment availability. Delays in salvage could have significant impacts on other vessel traffic in the area.</p> <p>Spill Modeling Assessment Methodology</p> <p>Figure 13.5 Navigation Route Through the Strait of Juan de Fuca (page 1327) illustrates the vessel traffic lane from Haro Strait to Admiralty Inlet intersecting the project related vessels' traffic lane from the Strait of Juan de Fuca to Rosario Strait. The FEIS should model spills at the intersection of the traffic lanes in the eastern Strait of Juan de Fuca.</p> <p>Section 13.5.4.4. Modeled Spill Locations (page 1337) states: "Variations in the currents and winds at these four locations were accounted for by simulating average wind conditions during summer and winter, and by also using an annual average wind speed and direction." The DEIS does not use the required "adverse weather conditions" (as stated in in RCW 90.56.010 (28)) for the worst case spill scenario.</p> <p>The FEIS should provide information on source of the NOAA GNOME™ model location file called North Puget Sound Location file, how it was validated, and the resolution of bathymetry, shoreline, and current data. The North Puget Sound location file should be publicly available so that the oil spill analysis performed using GNOME™ in the FEIS can be reasonably evaluated by reviewing organizations.</p> <p>The DEIS states that the NOAA GNOME™ model location file called North Puget Sound is used for all oil spill analysis. There is no NOAA North Puget Sound Location file. According to NOAA, the Strait of Juan De Fuca is the only location file that exists for the Salish Sea. (The list of all NOAA location files can be found here:</p>	<p>As discussed in Sections 6.4.3.3 and 7.4.3.2 of the Draft EIS, a slick thickness of 0.1 µm (one order of magnitude less than the literature toxicity threshold of 1 µm) was selected as the conservative threshold for potential impacts. The toxicity threshold of 1 µm slick thickness was the minimum cutoff used in the biological effects model used by NOAA in their assessments of black oil (French-McCay 2009, French-McCay et al. 2002, French-McCay et al. 2004). The Draft EIS acknowledged that this slick threshold is a conservative estimate of toxicity for mixed xylenes and reformate since the NOAA model threshold is based on oil, which does have some volatile components but also has many other toxic components in the mixture that are not found in mixed xylenes and reformate. Additionally, many of the adverse effects from oil slicks are attributed to the persistent, highly toxic, high molecular weight compounds; none of these components are present in mixed xylenes and reformate, as noted in Chapter 13 of the Draft EIS. Impacts to birds, marine mammals, and turtles based on the 0.1 µm threshold are very conservative estimates (Howard et al. 1991).</p> <p>With respect to uncertainty, Appendix 13-A graphically depicts uncertainty in Figures 6-2 to 6-20. The associated descriptive data included in Appendix G displays both the forecast and uncertainty spatial extents of spilled materials. The uncertainty is designed to display the possible spatial extent of where spilled materials would be located (Appendix 13-A of the Draft EIS).</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to</p>

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		<p>http://response.restoration.noaa.gov/oilandchemicalspills/oilspills/responsetools/gnomelocationfilesandassociatedresources.html). The Strait of Juan De Fuca file does not cover the Anacortes area. This raises significant questions about how the GNOME™ model was used in this report. The bathymetry, currents, and shoreline data needed by GNOME™ to provide forecasts in a specific geographic area have a significant influence on the model results. We have no information on the quality, detail or extent of the data in the GNOME™ location file used in the DEIS. There is no information on the origin of the North Puget Sound location file.</p> <p>The FEIS should include modeling methods and scenarios that have been developed in consultation with diverse stakeholder input that include representatives from marine scientific agencies and/or institutions, local governments, and nongovernmental environmental organizations.</p> <p>Spill Modeling Software</p> <p>Page 1335 of the DEIS acknowledges that “ADIOS 2.0 does not simulate the trajectory and spreading of the oil within a geographical representation like GNOME™. The resulting spill modeling therefore combined the geographical capabilities of GNOME™ with the evaporative computations of ADIOS 2.0.” Without further detail, it is impossible for the public to evaluate the accuracy of this methodology. We request that the Skagit County PDS document the method for integrating ADIOS computations with GNOME™ output and the rationale for that method. This documentation should be included in the FEIS.</p> <p>Spill Thickness</p> <p>The DEIS states that the NOAA GNOME™ analyst program was used to convert spill mass into thickness contours. NOAA states that this tool is not publicly available (http://response.restoration.noaa.gov/oilandchemicalspills/oilspills/responsetools/frequentlyaskedquestionsaboutgnome.html). NOAA further state</p>	<p>the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <p>Marine vessel safety – Section ES7.11.2</p> <p>Regulatory requirements – Section 13.1</p> <p>Pilot and tug escort requirements – Section 13.4.1.2</p> <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>

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		<p>that the software is used to produce concentration contours not oil thickness estimates. Using of oil spill thickness is not a valid method for estimating oil spill impacts, nor is it a proper application of the GNOME™ model. The use of GNOME™ to determine oil thickness seems to conflict with the statement in Section 3.4.2 of Appendix 13a that “In GNOME™, spilled substances are modeled as point masses of Lagrangian elements (LEs) called splots, derived from spill dots. ... One splot does not equate to a specific quantity of spilled liquid. Instead, a splot indicates where some unquantified amount of spilled liquid may have traveled over time, based on the GNOME™ algorithms.” The method used in the DEIS to calculate oil thickness is not valid. It assumes that oil is spread uniformly over the spill area. That is contrary to the way oil spills on tidally influenced waters behave. Spaulding (Malcolm L. Spaulding, State of the art review and future directions in oil spill modeling, Marine Pollution Bulletin, Volume 115, Issues 1–2, 15 February 2017, Pages 719) documents the ways assumptions about uniform spreading and oil spill thickness are invalid.</p> <p>GNOME™ analyst does provide uncertainty information that is relevant to the DEIS analysis of oil spill risks. The DEIS does not provide these uncertainty estimates in its report.</p> <p>The FEIS needs to include a valid approach for estimating oil exposure for organisms using the water surface and water column during spills. The FEIS should also provide the uncertainty estimates to allow a complete assessment of oil spill risks.</p> <p>Additionally, the GNOME™ and ADIOS models only address surface oil. Xylene and reformate have water soluble components. In addition, during some wave and current conditions, both products can be mixed into the water column significantly increasing water column concentrations. The FEIS should include modeling of water column concentrations for the all scenarios. Those scenarios should include cases, such as the North Cape oil spill (see https://ntl.bts.gov/data/letter_am/ispr2.pdf), that increase vertical mixing of the spill materials. That spill involved a</p>	

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		<p>high volatility refined oil mixed into the water column.</p> <p>Weather Conditions During Modeled Spills</p> <p>The DEIS uses average wind conditions during summer and winter and an annual average wind speed and direction. No justification is given for using average winds speed and direction as representative conditions for oil spill analysis. It appears that these averages were derived from 20122015 weather records (Appendix 13a). No rationale is given for using this narrow record.</p> <p>The FEIS should examine the climatological record to determine high probability wind speeds, directions, and persistence from the climatological record. In addition, because adverse weather is a significant factor in vessel casualties, the FEIS should also identify representational extreme weather events and consider how that would affect salvage and response operations designed to mitigate spill effects. Finally, because historic weather patterns do not reflect conditions that will exist in the future operating environment, the FEIS should consider how changing weather and circulation patterns could change in the future because of climate change.</p> <p>WorstCase Spill Modeling Results</p> <p>Section 13.5.5.1. relies on a calculation of oil spill thickness that is not documented in the material available for the GNOME™ model (NOAA Technical Memorandum NOS OR&R 40 General NOAA Operational Modeling Environment (GNOME™) Technical Documentation). The analysis of impacts heavily relies on these calculations; however no support is provided for the validity of this method. The FEIS should support the use of this method with publications documenting its validity. Specifically, it should justify the rationale for assuming that a spill with a minimum thickness of 0.1 µm has less than significant impacts especially when water column concentrations are not considered.</p> <p>The DEIS application of GNOME uses only 1000 Lagrangian elements (LE) to simulate each spill scenario. This is the minimum number recommended by NOAA. NOAA states that using a small</p>	

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		<p>number of LE reduces the quality of the model statistics. Additional model runs should be conducted to determine if 10,000 LE better represent spill impacts as shown in Figures 133135 of Chapter 13. This is especially critical given the method applied for converting model output to oil spill thickness.</p> <p>Limits to Spill Response Were Not Properly Modeled</p> <p>The DEIS does not address the fact that oil spill containment measures could be hindered by VOC levels that would create a fire/explosion hazard or worker safety hazards. The FEIS should also consider historical information on the failure of spill response measures to contain oil spilling from vessels, especially in the event of a catastrophic release during adverse weather conditions. Specify, this section should address whether spill containment of xylene or reformat is safe under the prescribed spill scenarios. NOAA states, "Containment booming of gasoline spills is usually not attempted, because of fire, explosion, and inhalation hazards." (See https://docs.lib.noaa.gov/noaa_documents/NOS/ORR/910_response.pdf.) The FEIS should identify the frequency that one or more of the operating limits of spill response capacity will be exceeded and therefore a response will not be possible. For example, most open water response operations are not conducted during darkness. There are only approximately 8.5 hours of daylight at the Tesoro Anacortes refinery in December, significantly limiting response. Deployment of response equipment is also not possible under high wind and wave conditions, when currents exceed boom limits, or during extreme weather events.</p> <p>In order to evaluate the likelihood of such a disaster, the FEIS should identify under what conditions there would be gaps in response capacity due to adverse weather conditions and daylight availability when response operations would be able to deploy containment equipment. Corresponding mitigations should be required prior to issuance of Tesoro's Shoreline Permit.</p> <p>In order to address the numerous errors and deficiencies in the spill modeling and methodology included in the DEIS, the FEIS</p>	

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		<p>should include modeling methods and scenarios that have been developed in consultation with stakeholder input that include representatives from marine scientific institutions, nongovernmental environmental organizations, and local governments.</p> <p>Additional Mitigation Measures</p> <p>This project’s vessel traffic increases are compounded by the Trans Mountain Pipeline expansion’s additional 696 annual tanker transits, the Roberts Bank Terminal 2 and Centerm Terminal’s additional 640 annual container ship transits, and the additional 1,300 annual LNG carrier transits, to name just a few of the reasonably foreseeable new and expanding terminal projects in the Salish Sea.</p> <p>The FEIS should address additional mitigation measures to reduce the risk of a vessel casualty in the increasingly complex marine transportation environment evolving in the Salish Sea. At the very least, the risk mitigation measures addressed in the VTRA 2015 should be included in the FEIS. These include tug escort requirements and additional Emergency Response Towing Vessel(s). The FEIS should also address the risk mitigation measure priorities identified at the 2016 Salish Sea Oil Spill Risk Mitigation Workshop.</p>	
Ch13-226	Robert Pavia	<p>I focused on these sections of the DEIS because of my expertise in oil spill risk assessment and response. I am the former chief of the NOAA Oil and Hazardous Materials Response Division. In that capacity, I helped to develop oil spill preparedness plans in many coastal states of the U.S., in China, the Middle East, and elsewhere. I was also involved in hundreds of oil spills. Based on this experience and my concerns as a Skagit County resident, I ask that you consider the following comments on the DEIS.</p> <p>Tesoro’s treatment of oil spill risk in the DEIS is both inadequate in its scope and inaccurate in its conclusions. The shortfalls in the DEIS treatment of oil spill risk are so wide ranging, Tesoro can not be relied upon to comprehensively address them in the final EIS.</p>	<p>Oil spill scenarios responses are required to be included in the each Facility Response Plan and each Vessel Response Plan up to the worst-case scenario for both tankships and facilities and must be included and approved by the regulating USCG Captain of the Port Sector Puget Sound. These spill scenarios must also have mitigating response strategies that the facility or vessel must employ in responding to a spill. These requirements are clearly defined in 33 CFR 154 Subpart F; 40 CFR 112 Subpart D, Appendix F; and 33 CFR 155 subpart D. These requirements are also required by Washington State in RCW 90.56.210.</p> <p>The Vessel Traffic Study notes that from 1999-2005 the annual average number of vessels was 2,951 per year. From 2006-2010</p>

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		<p>The County should require that an outside group be established to provide input and oversight to Tesoro’s selection of oil spill scenarios and methods used in the final EIS. That group should include members of affected communities and tribes in Skagit and San Juan Counties and Federal representatives of threatened and endangered species that would be affected by an oil spill. Members of the group should be selected by Skagit County.</p> <p>A general shortfall of the DEIS is that the marine transportation and oil spill sections of the DEIS assess risks in the context of the current state of the Salish Sea rather than the Salish Sea as it will exist during the operational lifetime of the project. The marine transportation system expected to evolve over the next 5-10 years include a much higher level of traffic than the conditions considered in this report. The report should evaluate marine transportation risks and impacts using expected future states of the marine transportation system. Multiple scenarios describing potential future states could be necessary. For oil spill risks, changes in atmospheric and oceanographic conditions that will occur because of climate change should be fully integrated into the analysis. This should involve development of multiple scenarios that consider extreme weather events and storm surge among other climate related changes.</p> <p>Specific shortfalls include that the DEIS misapplies the GNOME™ oil spill model, does not fully consider atmospheric and oceanographic conditions in its oil spill scenarios, and does not fully consider the partitioning of xylene, refinery reformate, and backhaul gasoline blendstock in the environment. As a result, the DEIS conclusions about impacts to the environment and humans underestimate or misrepresent what could be expected in the event of a vessel casualty.</p> <p>Detailed examples of these inadequate and inaccurate representations in the DEIS include the following.</p> <p>13.3.2.3. Impacts on Vessel Traffic from Spills and Spill Response</p> <p>This section only addresses a spill and response with a maximum</p>	<p>the annual average was 2,909 (a decline of 42 vessels per year). From 2011 to the end of the study, the annual average was 2,838 vessels (a decline of 71 vessels per year). Yet assuming that traffic does increase over the next 5-10 years in the Salish Sea, technology used by the USCG in the Vessel Traffic Service has been upgraded and safer technologies are being incorporated into newer tankship construction.</p> <p>The Captain of the Port Sector Puget Sound maintains a heavy weather (including storm surge) port response contingency plan that would safely direct the activities of vessels within the Salish Sea. This would include the initiation of safety and secure zones to engage in spill response activities that would protect human health, the environment, and personal property.</p>

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		<p>duration of three days. The section should address longer periods of time that would be associated with spill release scenarios other than an instantaneous release. The assumption that an instantaneous release represents the worst-case scenario is not valid or representational. Appendix 13a Section 4.2.2 states “These large spill scenarios (e.g. thousands and hundreds-of-thousands of barrels) are highly improbable and would likely occur over time; a number of hours or perhaps days” The FEIS should explore scenarios with a full range of representative release scenarios to determine if they result in longer water column and atmospheric exposure of natural resources and humans to xylene, reformate, and gasoline blendstock.</p> <p>The section should consider delays associated with salvage operations necessary to address a vessel casualty. Salvage operations could last days, weeks or months. Salvage could be delayed due to weather, worker safety concerns associated with VOCs, or equipment availability. Delays in salvage could have significant impacts on vessel traffic, especially in the area near the facility pier.</p> <p>13.4.1. Affected Environment</p> <p>This section only addresses vessel routes entering the Straits of Juan de Fuca and ending at the refinery dock. Section 13.3.1.3. (Marine Vessel Anchorages) states “Marine vessels calling on ports and refineries in the Salish Sea may also visit other locations in the area to conduct non-cargo operations. These operations could potentially involve anchoring while waiting for an available berth and or bunkering (taking on fuel or lubricating oil)”</p> <p>These anchorage areas and transit routes to them should be included in assessments of vessel safety, traffic impacts, casualties, and associated pollution risks for all waterways in which vessel operations will potentially take place. Accidents involving bunkering operations at these locations should also be evaluated.</p> <p>13.5.3. Spill Scenarios and Regulatory Requirements</p> <p>This section only addresses potential spills of the products being</p>	

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		<p>transported, it does not consider spills of the propulsion fuel used in the vessels transporting the products including those that might be released during bunkering operations (see comment for 13.4.1). Vessel propulsion fuels are typically more persistent than xylene, reformat or blendstock. The FEIS should include spill scenarios involving vessel propulsion fuel releases. Those scenarios should consider how the loss of propulsion fuel with xylene, reformat, or blendstock will affect response operations and the risks to humans and natural resources.</p> <p>13.5.4.1. Spill Modeling Software</p> <p>This section states “ADIOS 2.0 does not simulate the trajectory and spreading of the oil within a geographical representation like GNOME™. The resulting spill modeling therefore combined the geographical capabilities of GNOME™ with the evaporative computations of ADIOS 2.0.”</p> <p>The FEIS should document the method for integrating ADIOS computations with GNOME™ output and justify the rationale for that method.</p> <p>13.5.4.3 Spill Thickness</p> <p>The DEIS states that the NOAA GNOME™ analyst program was used to convert spill mass into thickness contours. NOAA states that this tool is not publicly available (http://response.restoration.noaa.gov/oil-and-chemical-spills/oil-spills/response-tools/frequently-asked-questions-about-gnome.html). If the program is not publicly available, how can we know that Tesoro properly applied the model in its analysis? Using of average oil spill thickness is not a valid method for estimating oil spill impacts, nor is it a proper application of the GNOME™ model. The use of GNOME™ to determine oil thickness seems to conflict with the statement in Section 3.4.2 of Appendix 13a that “In GNOME™, spilled substances are modeled as point masses of Lagrangian elements (LEs) called splots, derived from spill dots. ... One splot does not equate to a specific quantity of spilled liquid. Instead, a splot indicates where some unquantified amount of</p>	

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		<p>spilled liquid may have traveled over time, based on the GNOME™ algorithms.”</p> <p>The assumption of uniform surface oil spreading used in the DEIS to calculate oil thickness is not valid. That assumption is contrary to the way oil spills behave on tidally influenced waters. Spalding (Malcolm L. Spaulding, State of the art review and future directions in oil spill modeling, Marine Pollution Bulletin, Volume 115, Issues 1–2, 15 February 2017, Pages 7-19) documents why assumptions about uniform spreading and oil spill thickness are invalid. The FEIS needs to adapt a valid approach for estimating oil exposure for organisms on the water surface and in the water column during spills.</p> <p>GNOME™ analyst does provide uncertainty information that is relevant to the DEIS analysis of oil spill risks. Yet the DEIS does not provide these uncertainty estimates in its report. The FEIS should incorporate oil trajectory uncertainty estimates to allow a complete assessment of oil spill risks.</p> <p>13.5.5.4 Modeled Spill Locations</p> <p>The DEIS uses average wind conditions during summer and winter and an annual average wind speed and direction. No justification is given for using average winds speed and direction as representative conditions for oil spill analysis. It appears that these averages were derived from 2012-2015 weather records (Appendix 13a). No rational is given for using this narrow record. The FEIS should examine the full temporal and geographic climatological record to determine high probability wind speeds, directions, and persistence cases for us in oil spill models. In addition, because adverse weather is a significant factor vessel casualties, the FEIS should also identify representational extreme weather events and consider how that would affect salvage and response operations designed to mitigate spill effects. Finally, because historic weather patterns do not reflect condition that will exist in the future operating environment, the FEIS should consider how weather, storm, and water circulation patterns could change in the future</p>	

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		<p>because of climate change.</p> <p>13.5.5. Spill Modeling Results</p> <p>This spill scenarios used in this analysis all assume an instantaneous release of the spilled material. The FEIS should also consider scenarios where material is spilled over hours or days. Historical data show that such scenarios are consistent with how oil spills occur in the real world. These types of scenarios result in longer exposure periods for affected resources and more serious consequences to them.</p> <p>The GNOME™ and ADIOS models only address surface oil. Xylene, reformat, and gasoline blendstock have water soluble components. In addition, during some wave and current conditions, both products can be mixed into the water column significantly increasing water column concentrations. The FEIS should include modeling of water column concentrations for all scenarios. Those scenarios should include cases, such as the North Cape oil spill (https://ntl.bts.gov/data/letter_am/ispr2.pdf), that increase vertical mixing of the spill materials. The North Cape spill involved a high volatility refined oil mixed into the water column in ways not considered in any DEIS scenarios.</p> <p>13.5.5.1. Worst-Case Spill Modeling Results</p> <p>This section relies on a calculation of oil spill thickness that is not supported by research as noted above. If the FEIS will use oil spill thickness as a surrogate for toxic exposure, it needs to substantiate that the rationale for assuming a spill with a minimum thickness of 0.1 µm does not have significant environmental impacts, including specific consideration of endangered species such as Orca whales. All spill scenarios should also consider water column concentrations.</p> <p>The DEIS application of GNOME™ uses only 1000 Lagrangian elements (LE) to simulate each spill scenario. This is the minimum number recommended by NOAA. NOAA states that using a small number of LE reduces the quality of the model statistics. The FEIS model runs should be conducted to determine if 10,000 LE better</p>	

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		<p>represent spill impacts as shown in Figures 13-3-13-5 of Chapter 13. This is especially critical given the method applied for converting model output to oil spill thickness.</p> <p>13.5.6. Spill Likelihood</p> <p>This section, rather than 13.6., should address how accident risk would change over time due to the forecast increase in tanker traffic associated with the recently approved Trans Mountain pipeline expansion in British Columbia and other proposed or approved operations that will increase complexity and risk within the Salish Sea marine transportation system. The FEIS should address how the very significant increase in tanker traffic could affect spill probabilities for the Tesoro project.</p> <p>13.5.7. Spill Response</p> <p>The FEIS should consider how oil spill containment measures would be hindered by VOC levels that could create a fire/explosion hazard or worker safety hazards. The FEIS should also consider historical information on the failure of spill response measures to contain oil spilling from vessels, especially in the event of a catastrophic release during adverse weather conditions. Specifically, this section should address whether spill containment of xylene, reformate, or backhaul of gasoline blendstock is safe under the prescribed spill scenarios. NOAA states that “Containment booming of gasoline spills is usually not attempted, because of fire, explosion, and inhalation hazards.” (https://docs.lib.noaa.gov/noaa_documents/NOS/ORR/910_response.pdf). The FEIS should identify when response operations would be able to deploy containment equipment.</p> <p>The FEIS should identify the frequency that one or more of the operating limits of spill response capacity will be exceeded and therefore a response will not be possible. For example, most open water response operations are not conducted during darkness. There are only approximately 15.5 hours of darkness at the Tesoro facility in December, significantly limiting response. Deployment of response equipment is also not possible under high wind and wave</p>	

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		<p>conditions, when currents exceed boom limits, or during extreme weather events. The gaps in response capacity due to these limitations should be documented and mitigation measures addressed in the FEIS.</p> <p>13.5.10. Additional Mitigation Measures</p> <p>The FEIS should identify additional actions that could be taken to mitigate vessel traffic conflicts that will occur as vessel traffic increases due the Tesoro refinery expansion, Trans Mountain pipeline expansion, and other proposed projects. For example, human factors are often permissive causes in vessel casualties. Crewing standards on ships and barges, training, rest periods or other mitigation measures should be identified that would reduce the risk of a vessel casualty in the increasingly complex marine transportation environment evolving in the Salish Sea.</p> <p>Appendix 13a</p> <p>The DEIS states that the NOAA GNOME™ model location file called North Puget Sound is used for all oil spill analysis. There is no NOAA North Puget Sound Location file. According to NOAA, the Strait of Juan De Fuca is the only location file that exists for the Salish Sea and it does not cover the full DEIS study area. (The list of all NOAA location files can be found here: http://response.restoration.noaa.gov/oil-and-chemical-spills/oil-spills/response-tools/gnome-location-files-and-associated-resources.html). This raises significant questions about how the GNOME™ model was used in this report. The bathymetry, currents, and shoreline data needed by GNOME™ to provide forecasts in a specific geographic area have a significant influence on the model results. We have no information on the quality, detail or extent of the data in the North Puget Sound location file used in DEIS oil spill modeling.</p> <p>The FEIS should provide information on the source of the North Puget Sound location file, how it was validated, and the resolution of bathymetry, shoreline, and current data. The North Puget Sound location file should be made publicly available so that the oil spill</p>	

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		analysis performed using GNOME™ in the FEIS can be reasonably evaluated by reviewing organizations.	
Ch13-227	Evergreen Islands	<ul style="list-style-type: none"> • What is the capacity to respond to spills of Xylene or its constituent products spilled on land or sea? • What additional spill response equipment will be purchased to respond to a spill of Xylene or constituent products? • What are the types of health risks to which spill responder be exposed? How will these impacts be mitigated? • Does the potential for human health impacts reduce the speed with which a spill response could be conducted? 	Thank you for your comment. This comment was previously received as part of public scoping, and was considered in preparing the Draft EIS.
Ch13-228	Evergreen Islands	<ul style="list-style-type: none"> • What are the concerns about oil spills at the project site and the marine loading area? • What are the concerns about oil spills along rail and marine vessel transportation routes? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Ch13-229	Orca Network, Howard Garrett	<p>Here are just a few ways this project would inevitably degrade the ecological productivity of the Salish Sea, thus harming orcas and human residents:</p> <ul style="list-style-type: none"> • A xylene spill would cause severe air quality impacts to our residents, visitors, boaters, first responders, and marine ecosystem. • A vessel spill would result in significant and long-lasting detrimental impacts to our islands’ biological communities and natural beauty. • The DEIS spill modeling did not include all the project cargos or any propulsion fuels or complications from adverse weather conditions — as required by state law. 	<p>The Draft EIS discusses the potential impacts of marine spills on marine wildlife, including Southern Resident Killer whales, in Section 7.4. Additional information regarding agencies responsible for protection of Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information concerning potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Cumulative impacts on air quality and climate change as a result of the proposed project are discussed in Sections 4.7 and 4.8 of the Draft EIS.</p> <p>Additional information regarding agencies responsible for emissions from new or modified sources at the refinery is</p>

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			<p>provided in Table 2 in Section 3.1 of this Final EIS. Additional information on proposed project emissions and potential mitigation has been further analyzed in Section 3.3 of this Final EIS.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating spill prevention, spill response, and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessels, spill prevention, and spill response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill modeling, spill likelihood, and spill response is provided in Section 3.9, and additional information regarding fuel leaks is provided in Section 3.9.2.1 of this Final EIS.</p>
Ch13-230	Orca Network, Howard Garrett	<p>We ask that the Final Environmental Impact Statement include:</p> <p>...</p> <ul style="list-style-type: none"> • Spill modeling methods and scenarios that have been developed in consultation with diverse stakeholders, including marine science 	<p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan, Geographic Response Plans, and the Tesoro OSCP, which is approved by Ecology and the USCG (see Appendix 13-A of the Draft EIS). Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR</p>

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		institutions, environmental organizations, and local governments.	<p>155-1020 and include the worst-case discharge, which means a discharge of a vessel’s entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™ a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (Appendix 13-A of Draft EIS).</p> <p>Additional information related to spill modeling is provided in Section 3.9.2 of this Final EIS.</p>
Ch13-231	Orca Network, Howard Garrett	<p>We ask that the Final Environmental Impact Statement include:</p> <p>...</p> <ul style="list-style-type: none"> • Potential damage to our region’s beautiful marine environment from all project-related fuel and cargo spills, including the impacts to marine life, especially the unique Cherry Point herring and other forage fish — impacts that will persist longer than the duration of any spill, possibly for years or even decades, as seen in Prince William Sound since the Exxon Valdez catastrophe of 1987. 	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Information regarding agencies responsible for permitting and overseeing these plans is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The potential impacts if a spill were to occur are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3 • Special status species, including marine birds, shorebirds, waterfowl, and other marine wildlife species – Section 6.5 • Marine life and nearshore resources, including forage fish (note the Cherry Point herring stock is outside the study area) – Section 7.4.3 • Land and shoreline use – Section 10.3.2 • Aesthetics and visual resources – Section 10.5.2 • Vessel spills, likelihood, and response – Section 13.5 • Spill prevention and response measures are discussed in the following sections of the Draft EIS: • Construction and operational site controls at the refinery and

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			<p>wharf – Sections 2.7.6 and 2.8.5</p> <ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology’s Office of Marine Transportation, and the USEPA.</p> <p>Additional information regarding spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>The Exxon Valdez spill involved crude oil. Mixed xylenes and reformat would behave differently in the marine environment as described in Section 13.5.2 and Appendix 13-A of the Draft EIS.</p>
Ch13-232	Michael Godwin	<p>I ask that the Final Environmental Impact Statement include:</p> <p>Spill modeling methods developed in consultation with diverse stakeholders, especially local governments, marine science institutions, environmental organizations and any and all federally recognized tribes that believe they have treaty rights and waters affected by the shipping routes.</p>	<p>The Draft EIS discusses the results of the marine vessel spill modeling in Section 13.5.5. The methodology, assumptions, and model result figures are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B. The fate and behavior analysis of reformat and mixed xylenes in the marine environment is presented in Appendix 13-A.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan Geographic Response Plans and the Tesoro OSCP, which is approved by Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel’s entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS,</p>

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			<p>prepared by Polaris Applied Sciences in 2016).</p> <p>Skagit County hired a separate company for independent review of the modeling provided by Tesoro, and additional analysis was provided in the Draft and Final EIS documents as necessary. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>Tribes, government agencies, NGOs, and other interested parties have been invited to provide input to the Draft EIS. See Section 1.4 and Chapter 15 of the Draft EIS for details on engagement with stakeholders, and the stakeholders notified of the EIS process, respectively.</p>
Ch13-233	Michael Godwin	<p>I ask that the Final Environmental Impact Statement include:</p> <p>...</p> <p>Potential damage to our region’s “beautiful marine environment” brand from all project-related fuel and cargo spills, including the impacts to tourism, vacation and retirement home revenues, and fisheries — impacts that will persist longer than the duration of any spill.</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate and do not bioaccumulate (see Section 13.5.7 of the Draft EIS).</p> <p>The potential impacts to tourism, revenues, and fisheries if a spill were to occur along the marine vessel transportation route are</p>

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			<p>discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2 • Aesthetics and visual resources – Section 10.5.2 • Economics/employment income and tourism (including vacation homes) – Section 11.5.2.4 • Tribal fisheries and aquaculture – Section 11.5.2.4 <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-234	Raph Car	To whom it may concern:- as a resident in close proximity to the Sound, I am concerned by and I oppose the handling of xylene due to the risk of spills. Please could you take into account the suggestions from Safe Shippers in the Final Environmental Impact Statement?	<p>The effects of anchoring associated with the proposed project are discussed in Sections 7.4.1.1 and 7.4.2.1 of the Draft EIS, respectively. Marine vessel anchorage data is discussed in Section 13.3.1.3. Additional information regarding anchorages, bunkering, and the USCG’s processes to regulate these areas is provided in Sections 3.8 and 3.9 of this Final EIS.</p> <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch13-235	Vernon Lauridsen	<p>Make Tesoro underwrite the worst case scenario. Xylene is a carcinogen and highly volatile. I understand that a similar xylene manufacturing plant in China suffered a devastating explosion and fire for the second time in two years. Evidently, the Chinese government is dismayed to find that Chinese citizens object to building more such manufacturing plants in China. A major spill, explosion or fire would devastate Fidalgo Bay, Pedilla Bay, Anacortes and Skagit County for generations. If the Chinese Government listens to its citizens, why can't you. If you cannot outright deny the Tesoro xylene project then make them have capital available or insurance coverage that would at least pay compensation to the people and environment in the event of a disaster. Think of the Exxon Valdez. Once that compensation is calculated and imposed then the project becomes uneconomic. You see, Tesoro wants the public to pay for the disaster that will inevitably occur. ... Here is a photo of the Chinese xylene plant that exploded in Zhanghou in 2015. Imagine this happening on March Point.</p> <p>http://www.abc.net.au/news/image/6375156-3x2-700x467.jpg</p>	<p>An explosion did occur at a paraxylene plant in China on April 7, 2015. The root cause for this incident was determined to be related to poor safety procedures and oversight. The explosion discussed in the referenced articles was determined to be caused by a leak of paraxylene that occurred as a result of poor welds. In contrast to the China facility, the Tesoro Anacortes refinery must follow industry standards and legal requirements to confirm the integrity of welds and conduct routine pressure testing for safety. Specifically, Tesoro maintains a certificate of inspection by the Washington State Department of Labor and Industries for all pressure vessel testing and inspections and has certified National Board inspectors on site. The refinery also maintains certified welders, inspectors, and metallurgy personnel.</p> <p>The refinery maintains its own firefighting resources, including a trained fire response team, in addition to mutual aid agreements with industrial neighbors and other refineries to respond to petroleum fires or explosions. The Draft EIS discusses the availability of fire and emergency response services and potential impacts to them in the event of an unplanned event in Sections 11.4.1.2 and 11.4.2. Appendix 2-A discusses existing operations and controls, process safety management, preventive measures and inspections, and oil spill response in place at the refinery. Additional information regarding Tesoro's emergency response planning and coordination with local services is provided in Section 3.7.1 of this Final EIS.</p> <p>The LEPC, implemented by EPCRA, manages community safety by working in coordination with the refinery to oversee their emergency response program. Additional information regarding the agencies responsible for regulating community safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding xylene as a human carcinogen is provided in Section 3.6 of this Final EIS.</p>
Ch13-236	Barbara Aguero	The undeniable risk of spill. We cannot tolerate even one spill of dangerous, toxic chemicals into the Salish Sea. Too much marine	Thank you for your comment.

ID	Contact	Comment Text	Response
		life, and human life ultimately will be negatively impacted.	
Ch13-237	Wayne Huseby	I would like them to actually quantify their assessment of increased shipping incident risk and corresponding capacity/capability to mitigate. A vague qualitative response should not be acceptable.	<p>The Draft EIS provides quantified analysis of spill likelihood in Section 13.5.6 based on data from the International Tanker Owners' Pollution Federation, Merrick and van Dorp's Draft Final VTRA report, and Glostten Associates. Sections 13.3.2, 13.4.2, and 13.4.1 provide additional information on quantified vessel traffic increases and safety hazards..</p> <p>Spill prevention and response measures and resource capacity/capability are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating the piloting of vessels and vessel safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is provided in Table</p>

ID	Contact	Comment Text	Response
			<p>2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-238	David Perk	<p>The final Environmental Impact Statement should correct the following omissions from the draft version:</p> <p>Create an adequate disaster response plan with mitigation measures for water and air during a xylene spill at the refinery or from a tanker in the Salish Sea. Given the difficulty of tracking xylene spills and the toxic effects of xylene (https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996004/), it is of paramount importance to protect our southern resident orca population.</p>	<p>The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • The potential impacts to water and air quality if a spill were to occur are discussed in the following sections of the Draft EIS: <ul style="list-style-type: none"> • Air quality and greenhouse gas – Section 4.4.4 • Marine life and nearshore resources, including marine waters and Southern Resident killer whales – Section 7.4.3 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and the USEPA. Additional information regarding the agencies responsible for regulating disaster preparedness, spill prevention and control, and air emissions is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Additional information regarding air quality, greenhouse gases, environmental health, Southern Resident killer whales, and spills</p>

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			is provided in Sections 3.3, 3.5, 3.6, and 3.9 of this Final EIS.
Ch13-239	Maureen Scheetz	Xylene is a strong chemical that will destroy our marine environment if there is a spill.	Thank you for your comment.
Ch13-240	Anonymous	We do not need this Xylene anywhere around these waters and I know damn well the the record for clean up of this crap is non-existent.	Thank you for your comment.
Ch13-241	Anonymous	A spill which we would be ruined our tourism industry the natural beauty everything.	Thank you for your comment.
Ch13-242	Devon Oliver	Tanker spillss are very probable.	Thank you for your comment.
Ch13-243	Georgianna Morgan	What provisions are in place to measure the before and after sea life available if a spill should occur.	As described further in Section 3.7 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations. An evaluation of damage could include post-spill measurements and results would be compared to available data from applicable agencies such as USFWS or NOAA.
Ch13-244	Ben Bama	A comprehensive EIS needs to be done, one that complies with state law and addresses spills from all potential cargos and propulsion fuels in adverse weather conditions.	Additional information regarding spill modeling, including adverse weather and propulsion fuels, is provided in Section 3.9.2 in this Final EIS.
Ch13-245	Heather Oaks	we really need to have in addition some mitigation for all the impacts to the Washington State is in terms of disruption of services of the spill it would be an economic disaster as well.	<p>The Draft EIS discusses the prevention, control measures, and BMPs in the potential impacts sections of Chapters 3 through 13. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p> <p>The potential impacts to services and economic resources if a spill were to occur along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p>

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Public services – Section 11.4.2 • Economics/employment income – Section 11.5.2.4 • Tribal fisheries and aquaculture – Section 11.5.2.4 • Vessel traffic and vessel safety – Sections 13.3.2.3 and 13.4.2.3 <p>The refinery’s existing spill prevention and response plans, including the OSCP, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating spill prevention and control is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding marine spills, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-246	Camille Meehan	<p>Xylene spills would cause severe air quality impacts and are difficult to clean up. Spills could result in hurt Anacortes and San Juan Islands economy as whale watching, sport fishing and tourist transit via ferry could be put on hold. We also don't know the long lasting affects to the health of the Sound and any deterioration of the health of the areas ecosystem reflects on the people of the area as lost money as their value as a tourist destination decreases.</p>	<p>Thank you for your comment.</p>
Ch13-247	Camille Meehan	<p>I ask that your final EIS include the following as well as address any of my comments above:</p> <p>...</p> <ul style="list-style-type: none"> • Spill modeling methods developed in consultation with diverse stakeholders, especially local governments, marine science institutions, environmental organizations and any and all tribes that believe they have waters affected by the shipping routes. 	<p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan Geographic Response Plans and the Tesoro OSCP, which is approved by Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel’s entire cargo. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of</p>

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			<p>the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>The Draft EIS discusses the spill modeling assessment methodology in Section 13.5.4 and Appendix 13-B of the Draft EIS. Additional information regarding spill modeling is provided in Section 3.9.2 of this Final EIS.</p>
Ch13-248	Gay Wilmerding	<p>Xylene is very toxic, and introducing more ships into the Salish Sea affects the marine life, and there needs to be a complete environmental impact statement and study of of the effects if there's any kind of a wreck or multiplier effect if the boat starts to sink and any kind of omissions might affect air emissions during production might affect the wildlife that we have here in the states spend a lot of money and improving the shellfish industry and with xylene and or bunker fuels from ships would adversely affect that and the waters are very cold and deep. I know because I row everyday. Making clean up rather difficult and so I hope that you would look seriously at this.</p>	<p>Thank you for your comment.</p>
Ch13-249	Ursula Mass	<p>The DEIS spill modeling did not include all the project cargos or any propulsion fuels or complications from adverse weather conditions-as required by State Law. Therefore the final EIS should include</p> <p>spill modeling methods and scenarios that have been developed in consultation with marine science institutions, environmental organizations and local governments.</p>	<p>Additional information regarding modeling of vessel propulsion fuel spills and adverse weather is provided in Section 3.9.2 of this Final EIS.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan, Geographic Response Plans, and the Tesoro OSCP, which is approved by Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel's entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>Skagit County hired a separate company for independent review</p>

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			of the modeling provided by Tesoro, and additional analysis was provided in the Draft and Final EIS documents as necessary.
Ch13-250	Sigrid Asmus	Fossil fuels like those proposed to be brought into and processed in the Salish Sea area are vulnerable to spills, leaks, and explosions, and these substances are already known to be essentially impossible to clean up or effectively mitigate. Prevention of risk and damage must be prioritized.	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 <p>The Draft EIS analyzed the potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire, explosion, and spills to land and the marine environment. The potential impacts of unplanned events are described in the following sections of the Draft EIS:</p>

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Spill likelihood and response, and summary of impacts of spills on environmental resources – Section 13.5 • Marine and nearshore resources – Section 7.4.3 • Unplanned events – Section 9.6 • Vessel traffic – Section 13.3.2.3
Ch13-251	Ellen Winter	<p>We want to encourage you and your environmental impact statement to look at ways to either keep the shipments out of the San Juan Puget Sound area or not produce xylene which is extremely toxic and dangerous and there's a potential of explosion. Just pleading with you to consider all of the people that would be impacted by any kind of a spill or explosion of this stuff and there's just innumerable problems that need to be dealt with.</p>	Thank you for your comment.
Ch13-252	Robin Hirsch	<p>Tesoro should NOT be permitted to transport xylene on the Salish Sea for the following reasons:</p> <p>More tank vessel traffic will increase the risk of xylene, reformate and propulsion fuel spills.</p>	Thank you for your comment.
Ch13-253	Robin Hirsch	<p>Tesoro should NOT be permitted to transport xylene on the Salish Sea for the following reasons:</p> <p>The DEIS spill modeling did not include all the project cargos or any propulsion fuels or complications from adverse weather conditions — as required by state law.</p>	Additional information regarding spill modeling, including adverse weather and propulsion fuels, is provided in Section 3.9.2 in this Final EIS.
Ch13-254	Val Veirs	<p>In addition, I think that you should require that a worst-case marine accident study be carried out. This would likely be a collision between a xylene tanker and another large vessel. The worst case scenario should be such an accident in light wind and stable atmospheric conditions wherein the volatile xylene escapes from the tanker and lies close to the surface of the water and slowly spreads out. Under such conditions, I expect that any shoreline residents or visitors, any recreational boaters and any marine mammals including our [Southern Resident Killer Whales] SRKW's would die by inhalation of fatal concentrations of this</p>	<p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan Geographic Response Plans and the Tesoro OSCP, which is approved by Ecology, the USCG, and USEPA. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel's entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a</p>

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		<p>heavy and poisonous gas or at the least suffer compromised neurological issues.</p>	<p>trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>The potential impacts to residents, visitors, boaters, and marine mammals if an incident or spill were to occur along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Spill likelihood and response, and summary of impacts of spills on environmental resources – Section 13.5 • Marine and nearshore resources, including marine mammals and the Southern Resident killer whales – Section 7.4.3 • Human health – Section 9.6.2 • Land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2 • Vessel traffic and vessel safety – Sections 13.3.2.3 and 13.4.2.3 • Details about spill response plans, control measures, and safety practices along the marine vessel transportation route are discussed in the following sections of the Draft EIS: <ul style="list-style-type: none"> • Oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformato into the marine environment – Section 13.5.7 <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>

ID	Contact	Comment Text	Response
Ch13-255	Kari Graydon	<p>I oppose the Tesoro Anacortes Xylene Proposal for many reasons, but will list the two major ones.</p> <p>There is a wildly increased chance of a spill, which Washington is NOT equipped to deal with. A spill will affect our orca whale population, among other important sea life.</p>	<p>The Draft EIS analyzed the likelihood of a marine spill occurring based on the historical record. It examined spill prevention and response measures (response plans, equipment, and personnel) that would minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill (Section 13.5 of the Draft EIS.)</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>The Draft EIS discusses the potential impacts from xylene spills on marine life in the following sections:</p> <ul style="list-style-type: none"> • Marine life and nearshore resources (including impacts on

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			<p>Southern Resident killer whales) – Section 7.7</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 <p>Additional information regarding the potential impacts on Southern Resident killer whales and other marine life from marine spills is provided in Section 3.5 of this Final EIS.</p>
Ch13-256	Bill Bowman	<p>Recovery standards don't exist for Xylene and Reformate. To assume that said chemicals will evaporate and dissipate within the "theoretical maximum 2-3 day time limit" is hubristic to say the least, (DEIS chapter 13, page 8).</p> <p>Please consider the ramifications of this neurotoxin if released into our environment in the event of an accident / spill.</p>	Thank you for your comment.
Ch13-257	Rebecca Meloy	<p>In 1989 my husband and I had our Alaska salmon fishing livelihood decimated by an oil tanker's massive leak by Exxon.</p> <p>We helped to try to clean up the oil. That Exxon process was a joke. The environment and wildlife were destroyed.</p> <p>The Bush administration did away with the punitive damages that the court had set. It took a working life-time of twenty years to be compensated for our loss. By that time a majority of the recipients were dead.</p> <p>I do not support oil tankers.</p> <p>I expect our government to take actions to protect our land, air, and water, in perpetuity, for our future health, longevity, and livelihood. Polluting technology is a dead end.</p>	Thank you for your comment.
Ch13-258	Ed Gastellum	<p>What long term significant impacts would there be of a ship load of xylene spilling into the channel or bulk fuel escaping and being distributed to both protected bays under the worst conditions of a strong winter storm. What studies have been made to prove the contention of Tesoro that impacts would be minimal. As we are</p>	<p>The Draft EIS discusses the results of the marine vessel spill modeling in Section 13.5.5. The methodology, assumptions, and model result figures are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B. The fate and behavior analysis of reformate and mixed xylenes in the marine environment is presented in</p>

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		<p>dealing with xylene and bulk fuel from ships which is part of the project no analysis has been done on the worst case scenario of a loss of bulk fuel in and around the refinery.</p> <p>The draft EIS fails to address the long term significant impacts of additional vessels brought in that sit and produce toxic health hazard chemicals while waiting and loading the xylene product.</p>	<p>Appendix 13-A.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan Geographic Response Plans and the Tesoro OSCP, which is approved by Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel’s entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>Table 4-12 of the Draft EIS provides marine vessel emissions while unloading.</p> <p>Potential impacts on marine life, human health, vessel traffic, and economics in the region if a spill were to occur are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine life and nearshore resources – Section 7.4.3 • Human health – Section 9.6.2 • Land and shoreline use – Section 10.3.2 • Economics/employment income – Section 11.5.2.4 • Vessel traffic – Section 13.3.2.3 <p>The refinery’s spill prevention and response plans, such as the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is</p>

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			provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-259	Charles Rapport	History has time and again revealed that a ruinous leak that wrecks the ecology of a particularly important and beautiful area is not a matter of if, but of when. Please do not go there.	Thank you for your comment.
Ch13-260	Court Olson	Furthermore, we certainly can't afford the spillage risk of such harsh chemicals as they propose to develop and ship from that location in their proposal.	Thank you for your comment.
Ch13-261	Margaret Kinsella	I object to the project for several reasons: - The increase in vessel traffic increases the risk of spills, the impact of which will be devastating to our ecosystem and tourism which is based upon the beauty of our natural place.	Thank you for your comment.
Ch13-262	Margaret Kinsella	I object to the project for several reasons: -The DEIS spill model did not include all the project cargos or propulsion fuels or the complications severe weather can produce as required by law.	Additional information regarding spill modeling, including adverse weather and propulsion fuels, is provided in Section 3.9.2 in this Final EIS.
Ch13-263	Louise Dustrude	This is such an appalling idea. One spill will negate all the supposed "benefits" of shipping these substances through these waters.	Thank you for your comment.
Ch13-264	Bob Zeigler	The proposed project would appear have impacts with some in construction and more in operation and transport with spills on the natural environment and cultural resources (fishery and marine related) and neighboring Swinomish Nation.	Thank you for your comment.
Ch13-265	Anne Greene	The DEIS does not include a thorough review of the safety requirements and full impacts of the project, such as:	The Draft EIS analyzed the potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire,

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		<p>...</p> <p>- the impact of a possible spill in an already congested marine area;</p>	<p>explosion, and spills to land and the marine environment. The potential impacts of unplanned events are described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Spill likelihood and response, and summary of impacts of spills on environmental resources – Section 13.5 • Marine and nearshore resources – Section 7.4.3 • Unplanned events – Section 9.6 • Vessel traffic – Section 13.3.2.3 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and the USEPA. Additional information regarding the agencies responsible for regulating the piloting of vessels, and spill prevention and control, is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-266	Mary Carol Britt	Our ecosystem would be greatly harmed if a spill occurred.	Thank you for your comment.
Ch13-267	Joline Betterndorf	The draft EIS for proposed changes in the Tesoro-Anacortes Refinery is incomplete. Among problems avoided or give short shrift are:... 2) the reliance on the company's assurance of adequate safeguards against land and marine spills and air pollution;	There are regulatory safeguards also in place for land and marine spills and pollution. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA, air pollution requirements are administered by Ecology. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS.
Ch13-268	Joline Betterndorf	The effects of even one major ship accident in Rosario Straits or the Guemes Channel or of a fire at the refinery would be a disaster of unimaginable consequence.	<p>The Draft EIS analyzed the potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire, explosions, and spills to land and the marine environment, including spills affecting Rosario Strait and the Guemes Channel.</p> <p>The potential impacts on vessel traffic and vessel safety resulting from increased marine vessel traffic through the Salish Sea are discussed in Sections 13.3.2 and 13.4.2 of the Draft EIS. The</p>

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			<p>potential environmental impacts to specific resources in the event of a marine spill are discussed in Chapters 4, 6, 7, 9, 10, 11, 12, and 13 of the Draft EIS, and a summary from each chapter is provided in Section 13.5.8 for each resource topic (see Tables 13-29 and 13-30).</p> <p>Potential impacts of unplanned events (including fires and explosions) are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial vegetation and wildlife from fire or explosion – Section 6.4.3 • Human health from fire or explosion – Section 9.6.1 <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p>
Ch13-269	Sanford Olson	Skagit County may or may not have a legal obligation to consider impacts to jurisdictions beyond county borders; however, I believe Skagit County does have a responsibility to consider impacts to shared waters with its neighboring counties. For example, the proposed Project’s vessel traffic would transit the waters of and adjacent to San Juan County’s islands. Any Project spills, even	<p>Potential impacts to San Juan County are considered, including those that could result in the event of a marine spill, in the following chapters of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Chapter 4 • Terrestrial vegetation and wildlife – Chapter 6 • Marine and nearshore resources – Chapter 7

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		those in Skagit or other neighboring counties, could adversely impact San Juan County’s marine ecosystem, shoreline properties, marine transportation system, and economy.	<ul style="list-style-type: none"> • Land use and shoreline use – Chapter 10 • Social and economic environment – Chapter 11 • Marine transportation – Chapter 13
Ch13-270	Sanford Olson	Require the FEIS to model spills for all project related vessels while at anchor -- from both the anchorage and bunkering associated vessel traffic and the bunkering operations.	<p>The Draft EIS discusses the results of the marine vessel spill modeling in Section 13.5.5. The methodology, assumptions, and model result figures of scenarios for uncontrolled spills are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B. The fate and behavior analysis of reformate and mixed xylenes in the marine environment is presented in Section 13.5.2 and Appendix 13-A.</p> <p>The spill modeling described in the Draft EIS is applicable to vessels in transit, at anchor, and during bunkering operations. Bunkering activities are described in Section 13.1 and 13.3.1.4 of the Draft EIS. Bunkering activities must comply with applicable provisions of federal and state regulations (WAC 317-40).</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding anchorages, vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Sections 3.8 and 3.9 of this Final EIS.</p>
Ch13-271	Sanford Olson	<p>The FEIS should also address the risk mitigation measure priorities identified at the 2016 Salish Sea Oil Spill Risk Mitigation Workshop.</p> <p>The DEIS only addresses a Project spill with a maximum duration of three days. Spill scenarios should include a full range of representative release scenarios complicated by adverse weather conditions to determine if they result in longer water column and atmospheric exposure of natural resources and humans to xylene or other Project cargos and/or propulsion fuels.</p> <p>Delays associated with salvage operations necessary to address a</p>	<p>The proposed mitigation measures described in Chapter 4 of this Final EIS are consistent with the risk mitigation measures listed in Ecology’s summary report for the 2016 Salish Sea Oil Spill Risk Mitigation Workshop. These measures include, but are not limited to:</p> <ul style="list-style-type: none"> • Use of escort tugs and licensed pilots within the study area; and • Use of vessels with multiple independent cargo oil tanks,

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		<p>vessel casualty should also be addressed. Salvage operations could last days, weeks or months. Oil spill response and salvage could be delayed due to weather, worker safety concerns associated with VOC (volatile organic compound) levels (that would create fire/explosion hazards and/or worker safety hazards), daylight availability (most open water response operations are not conducted during darkness and there are few hours of adequate light in winter). Delays in spill response and/or salvage could have significant impacts on other vessel traffic (e.g., ferries).</p> <p>Require the FEIS to identify the gaps in response capacity due to adverse weather conditions and daylight availability, with corresponding mitigation measures.</p> <p>Require the FEIS to include a risk assessment of spills, and associated impacts, of all Project related cargos and propulsion fuels using all reasonably foreseeable future vessel traffic for the operational lifetime of the Project. For all cargo and propulsion fuel spill risks, changes in atmospheric and oceanographic conditions that will occur because of climate change should be fully integrated into the analysis. This could involve the development of multiple scenarios that consider extreme weather events and storm surge among other impacts.</p> <p>Require the FEIS to include modeling methods and scenarios that have been developed in consultation with diverse stakeholder input including San Juan County and Tribes.</p>	<p>rather than a single, large tank.</p> <p>The Draft EIS discusses the results of the marine vessel spill modeling in Section 13.5.5. The methodology, assumptions, and model result figures of scenarios for uncontrolled spills are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B. The fate and behavior analysis of reformate and mixed xylenes in the marine environment is presented in Section 13.5.2 and Appendix 13-A.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan Geographic Response Plans and the Tesoro OSCP, which is approved by Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel's entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>The potential impacts to workers and the ferry system if an incident or spill were to occur along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Spill likelihood and response, and summary of impacts of spills on environmental resources – Section 13.5 • Human health – Section 9.6.2 • Vessel traffic and vessel safety – Sections 13.3.2.3 and 13.42.3 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering,</p>

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			and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, adverse weather conditions, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-272	Sanford Olson	Require the FEIS to include a USCG and Ecology approved Oil Spill Contingency Plan specifically for all types of reformatate products to be transported to the refinery, all gasoline blendstocks to be transported from the refinery, in addition to the xylene products proposed for manufacture and export.	<p>The refinery’s existing spill prevention and response plans, including the OSCP and the SPCC Plan, would be modified to accommodate the proposed project. The Tesoro OSCP must be approved by Ecology and the USCG (see Appendix 13-A of the Draft EIS).</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding agencies responsible for regulating the safe handling and storage of oils and hazardous substances is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-273	Jesse Reyes	The likelihood of an industrial spill is too terrible to contemplate, but if the track record of the energy industry is any indication, this is not an if scenario but a when scenario.	Thank you for your comment.
Ch13-274	Liz Amsden	And before Tesoro does ANY further work, the city of Anacortes and the state of Washington should demand a HUGE bond to cover the costs of the inevitable spills and damage. Because they will play a corporate shell game and just walk away.	As described further in Section 3.7 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.
Ch13-275	Eric Sonett	<p>I ask that the FEIS:</p> <p>Account for marine recreation impacts to include the loss of income to businesses if there is a spill of any cargos and/or propulsion fuels;</p>	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill.</p> <p>The potential impacts if a spill were to occur are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Recreation – Section 10.4.2

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			<ul style="list-style-type: none"> • Economics/employment income – Section 11.5.2.4 • Tribal fisheries and aquaculture – Section 11.5.2.4 • Vessel traffic – Section 13.3.2.3
Ch13-276	Dell Goldsmith	My husband and I strongly oppose the expansion of the refinery. xylene is just another very toxic chemical that should be kept out of our waters. Accidents and leaks are inevitable. Would Tesoro or anyone be able to prevent and clean this up? NO!	Thank you for your comment.
Ch13-277	Kim Rice	My primary concern is the danger this imposes upon our fragile ecosystem, primarily in the event of a spill of this highly toxic petrochemical into the Salish Sea. This would be devastating to salmon and marine mammals including the endangered Orca whales. We simply cannot and must not take this risk!!	Thank you for your comment.
Ch13-278	Charles Hoover	<p>I am concerned that opponents to this project single out the shipment of xylene by tanker as an unacceptable risk. Daily, millions of gallons of gasoline, of which xylene is a component, are safely transported around the world by pipeline, tanker truck, personal automobiles, barges and ships. The handling of xylene and other petroleum distillates is based on mature regulations, practices and technology.</p> <p>I believe that the Tesoro Clean Products Upgrade Project will be safe for the environment and a benefit to Skagit County and should be ultimately approved for construction.</p>	Thank you for your comment.
Ch13-279	Sandy Rabinowitz	Xylene is a hazardous chemical, and a spill could have enormous consequences for the environment, ferry traffic, tourism and the fishing industry.	Thank you for your comment.
Ch13-280	Sandy Rabinowitz	I urge Skagit County to insist on the highest safety standards for the shipment and production of this dangerous chemical, especially for refinery workers, and to require Tesoro to create an adequate disaster mitigation plan in the event of a spill.	The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human

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			<p>health.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill likelihood – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Laws, regulations, and guidance for the protection of human health – Section 9.1 <p>The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating worker safety, spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS. Information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-281	Carolyn Barney	Xylene is known to be a highly toxic substance. According to the EIS "potential impacts of a xylene spill is rated as potentially significant but with a low likelihood of happening." However	Thank you for your comment.

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		<p>"cumulative impacts of marine vessels and traffic in the Salish Sea which includes proposed project and existing and future marine vessel traffic from other sources could impact the Southern resident killer whale population."</p> <p>I have lived in Anacortes for over 20 years and I am well aware that, unfortunately, accidents do indeed happen at the refineries.</p>	
Ch13-282	Val Veirs	<p>A spill or accident will affect a large number of individuals: residents of the San Juans (including Native Tribes), tourists, and recreational fishers and boaters, to name a few. There would be irreparable damage to the relatively pristine atmosphere of the islands and to the economy. Plus, what will happen in severe weather? Tesoro's spill modeling does not address this potential hazard.</p>	<p>The potential impacts to the residents, boaters, and the economy if an unplanned event were to occur along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Human health – Section 9.6.2 • Land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2 • Aesthetics and visual resources – Section 10.5.2 • Economics/employment income – Section 11.5.2.4 • Tribal fisheries and aquaculture – Section 11.5.2.4 • Minority and low-income populations – Section 11.7.2 • Vessel traffic and vessel safety – Sections 13.3.2.3 and 13.4.2.3 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, anchorage and bunkering, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-283	Val Veirs	<p>Modeling of potential spills should be handled by qualified marine scientists, environmentalists and governmental representatives.</p>	<p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Plan, Geographic Response Plans, and the Tesoro OSCP, which is approved by Ecology and the USCG. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill</p>

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			<p>planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel's entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME™, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A in the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>The Draft EIS discusses the spill modeling assessment methodology in Section 13.5.4. Additional information regarding spill modeling is provided in Section 3.9.2 of this Final EIS.</p>
Ch13-284	Carol Sullivan	<p>Please help protect what we have from the dangers listed below.</p> <p>First, Tesoro's safety record raises concern for spill risk. The DEIS doesn't adequately address the spill risk from this project, nor are there adequate disaster response plans with mitigation measures for water and air during a xylene spill at the refinery or from a tanker in the Salish Sea.</p>	<p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Laws, regulations, and guidance for the protection of human

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			<p>health – Section 9.1</p> <p>The refinery’s existing spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating worker safety, spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro’s safety improvements is provided in Section 3.6.3 of this Final EIS. Information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-285	Joan Poor	This project is not in our best interests. A xylene spill would cause severe air quality impacts to residents of the Salish Sea, to visitors and boaters. An accident or spill would be harmful to first responders, our tourism and recreational economies, our essential ferry traffic, and our marine ecosystems and wildlife.	Thank you for your comment.
Ch13-286	Joan Poor	When considering this project please consider the residents of Puget Sound shoreline communities, our children, our wildlife, and our fisheries, tourism, and recreational economies, all of which would bear unimaginable, long-suffering environmental and fiscal costs from a project spill. Please do not vaporize the vitality of our Salish Sea with this refinery expansion to provide xylene to fuel competing Asian economies.	<p>The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS.</p> <p>Potential impacts on marine life, human health, vessel traffic, and economics in the region if a spill were to occur are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife (including marine birds) – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine and nearshore resources – Section 7.4.3

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			<ul style="list-style-type: none"> • Human health – Section 9.6.2 • Land and shoreline use – Section 10.3.2 • Economics/employment income – Section 11.5.2.4 • Vessel traffic – Section 13.3.2.3 <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and the USEPA.</p> <p>Laws, regulations, and guidance about safe handling and storage of materials at the refinery are described in Sections 3.1 and 5.1. Laws, regulations, and guidance for marine transportation are described in Sections 7.1 and 13.1 of the Draft EIS.</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding the agencies responsible for regulating spill prevention and control is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations. Additional information regarding financial responsibility for a marine spill is provided in Section 3.7.2 of this Final EIS.</p>

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Ch13-287	Gay Wilmerding	<p>Please evaluate all transport options with spill modeling in bad weather as Washington requires, and for adverse effects on other shipping. The multiplier effects could be catastrophic if cleanup ships cannot reach or contain spills in timely fashion due to stormy waters, or if spillage sinks into inaccessible, cold canyons. It takes 30 years for water to churn nutrients from Fraser River 900-1,000 feet up from bottom on San Juan's west side. The tiny plankton and microscopic organisms, that form food-chain base for salmon, stellar seals and orcas, thrive on this rich food source. If contaminated with xylene or fuel, the entire ecosystem will be harmed and vulnerable species, like orca, will crash. Likewise, the economy as humans depend on vibrant fisheries, flora and fauna to flourish.</p>	<p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat (main feedstock for xylene production) evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills, and they do not leave a residue in the environment, but fully evaporate and do not bioaccumulate in the food chain (see Section 13.5.7 of the Draft EIS).</p> <p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3. The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel traffic, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 • Economics/employment income and tax receipts – Sections 11.5.2.4 and 11.6.2.2 • Marine birds – Sections 6.4.2 and 6.4.3 • Special status terrestrial species – Section 6.5 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Human health – Sections 9.3.2, 9.5.2, and 9.6.2 • Land and shoreline use, recreation, and visual resources – Sections 10.3.2, 10.4.2, and 10.5.2 • Treaty and traditionally used resources – Section 11.5.2.3 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and</p>

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			<p>U.S.EPA Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-288	Joe Bucek	<p>As well, wildlife can only flourish if we protect our resources. The EIS needs to explore and not minimize its acknowledgment that a worst case xylene spill could exceed the devastation of the Exxon Valdez disaster. Why would we make the choice to take that kind of risk without enough knowledge, no matter what measures and response systems are in place?</p>	<p>The reference to the Exxon Valdez oil spill in Section 13.5.6 of the Draft EIS was provided to indicate how rare the size of the worst-case volume spill would be when considering the historical record. The Exxon Valdez spill was crude oil, which has very different environmental impacts from xylenes and reformate. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills (such as crude oil), no chemicals are used in the cleanup of these types of product spills and they do not leave a residue in the environment, but fully evaporate (see Section 13.5.7 of the Draft EIS).</p>
Ch13-289	Vicki Thomas	<p>Washington is not adequately prepared for such spills which would be devastating to already threatened wildlife, like orcas, fishing and tourism, which are critical to the state.</p>	<p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of</p>

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			<p>preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the</p>

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			spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-290	Jaylen Schmitt	As someone who is extremely concerned about air quality and the environment which includes the potential risks of chemical spills, contaminating the oceans, our ground water and land, I believe the production and export of xylene by Tesoro should not be permitted.	Thank you for your comment.
Ch13-291	Vicki Thomas	There are grave threats to the Salish Sea. A spill in the Salish Sea would be difficult, if not impossible, to contain.	Thank you for your comment.
Ch13-292	Leslie Sharpe	The expansion project would increase the risk of an oil spill, for which Washington is not adequately prepared	<p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response.</p>

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			<p>In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>The proposed project is designed with secondary containment systems to contain spills at the refinery and spill detection devices to alert workers in the event of a spill. The system was designed such that spills within the developed portions of the refinery would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's wastewater treatment plant. If the containment failed or a spill occurred outside of containment, response measures would be implemented to control the spill to prevent impacts.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 <p>The refinery's existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and</p>

ID	Contact	Comment Text	Response
			spill response is provided in Section 3.9 of this Final EIS.
Ch13-293	Paul Franzmann	The Puget Sound region is far too important to endanger it with likely-to-fail at some time toxic compounds shipping port. Corporate profiteering of this stripe should be off the table.	Thank you for your comment.
Ch13-294	Karen Powers	The Salish Sea is already a challenging place for wildlife, but it does support a fishery and tourism for whale watching. Millions of people come to the Salish Sea to see wildlife. A large xylene spill would threaten life in the Salish Sea. The wild nature as well as the economy would be at risk. We will not tolerate such a risk.	Thank you for your comment.
Ch13-295	Liisa Wale	This increase [additional five tankers per month] also brings concern about more risk for spills. When (not if) a spill occurs it will effect our food supply, our health and the wildlife (like Heron) in the area both on land and water.	Thank you for your comment.
Ch13-296	Kate Lunceford	Washington State is not prepared to handle the increase in ship traffic and risk of spills. Also the accepted method of clean up is to let the spill evaporate during which time damage to human and other animal tissue occurs; in some cases death to marine animals.	<p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>The refinery's existing spill prevention and response plans, including the oil spill contingency plan, would be modified to</p>

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			<p>accommodate the proposed project.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating the spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-297	Iris Graville	<p>A xylene spill would cause severe air quality impacts to our residents, visitors, boaters, first responders, and marine ecosystem and would result in significant and long-lasting impacts to the San Juan islands' natural beauty and tourism economy.</p>	<p>Air quality impacts in the event of a xylene spill are discussed in Chapter 4 of the Draft EIS. Additional information regarding the impacts to humans, including first responders, is provided in Section 3.6 of this Final EIS. Spill response crews would have the appropriate training and personal protective equipment to avoid exposure to toxic materials in responding to a spill event at the refinery or in the marine environment and all marine vessels must have USCG-approved contracts with spill response organizations (see Section 3.5 of the Draft EIS).</p> <p>Potential impacts to San Juan County are considered, including those that could result in the event of a marine spill, in the following chapters of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Chapter 4 • Terrestrial vegetation and wildlife – Chapter 6 • Marine and nearshore resources – Chapter 7 • Land use and shoreline use, including recreational boating – Chapter 10 • Social and economic environment – Chapter 11 • Marine transportation – Chapter 13 <p>Requirements for the safe handling, transportation, and storage</p>

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			<p>of mixed xylenes are administered by the USCG, Ecology, and the USEPA. Additional information regarding the agencies responsible for regulating spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding spill prevention, response, and available resources is provided in Section 3.9 of this Final EIS.</p>
Ch13-298	Gunnel Clark	<p>A spill in the Salish Sea would be difficult to contain. Health impact on humans and animals following a spill would be substantial.</p>	<p>Thank you for your comment.</p>
Ch13-299	Gunnel Clark	<p>The EIS draft also mentions the increased spill risk, and that Washington state is not adequately prepared to respond to spills in the Salish Sea. The most common method of handling a xylene spill is to simply let the chemical evaporate from surface water over the course of several days. During that time, humans and animals exposed to xylene can face serious health threats by inhaling or ingesting the chemical</p>	<p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>The potential impacts to humans and animals if a spill were to occur along the marine vessel transportation route are discussed</p>

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			<p>in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Terrestrial wildlife, including marine birds – Section 6.4.3 • Special status species (including marine birds, shorebirds, waterfowl, and other marine wildlife species) – Section 6.5 • Marine and nearshore resources – Section 7.4.3 • Human health – Section 9.6.2 • Washington State is prepared to respond to a spill in the Salish Sea. Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS: • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 <p>The refinery’s existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, marine spills, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-300	Donald Harland	This proposal will increase the risks of a chemical spill in the Salish Sea.	Thank you for your comment.
Ch13-301	Dana Stewart	This proposal will leak or have a spill and that would be disastrous to people far and wide.	Thank you for your comment.

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Ch13-302	Brian Flaherty	How many leaks, breaks and spillages does it take for anyone to recognize that after more than a hundred years, the Petrochemical Industry has PROVEN that it cannot contain; nor, will it clean up the mess it makes with virtual every chemical transit??!?!	Thank you for your comment.
Ch13-303	Brian Flaherty	Please do NOT let them add more problems to what they cannot control!!! And, please also remember: It is not a question of "IF" it happens! It is quite simply "When!!"	Thank you for your comment.
Ch13-304	Carol Wise	Have we learned nothing from Exxon Valdez? Petrochemical use needs to wind down, not be expanded.	Thank you for your comment.
Ch13-305	Barbara Van Walsen	I am concerned that unless you follow the above listed restrictions [form 11] that there will be an accident that will equal or be worse than the Exxon Valdez mess. Yes, I realize we are talking about different chemicals but these chemicals are equally dangerous to the environment, the seas, the animals, and especially the workers.	Thank you for your comment.
Ch13-306	Herschel Surdam	THERE ARE ALWAYS SPILLS. The spills always kill wildlife, and the spills are never cleaned up adequately. Don't destroy this incredibly valuable area.	Thank you for your comment.
Ch13-307	Dianne Shiner	I was absolutely horrified to learn that you are considering the expansion of the Tesoro Refinery in order to export xylene, a highly noxious substance. If this is allowed and a leak occurs (which it surely will as history has shown), then what will I tell my grandchildren?	Thank you for your comment.
Ch13-308	Dirk Rogers	Exposure to these toxic products is no more safe than having them move through the water and food on your table. We all see the oily sheen on this body of water.	Thank you for your comment.

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Ch13-309	Karen Nelson	Clearly health and safety concerns along with the devastation economic impacts of a spill outweigh the narrow economic benefit afforded to a large corporation.	Thank you for your comment.
Ch13-310	Tim Dustrude	Tesoro should not add more threat of spills in the beautiful, pristine Salish Sea.	Thank you for your comment.
Ch13-311	Barbara Hegedus	THEY ALL SAY THEY'RE SAFE, YET SPILL AFTER SPILL INDICATES OTHERWISE! THE BEAUTIFUL NORTHWEST COULD BECOME ANOTHER DESTROYED NATURAL AREA - FOR BIG OIL PROFITS! A FULL REVIEW OF IMPACTS OF THIS EXPANSION IS MANDATORY - NOW!	Thank you for your comment.
Ch13-312	Martin Iseri	Accidents will happen, and saying sorry afterwards will not be enough.	Thank you for your comment.
Ch13-313	Lynn Moshier	I live in Florida so I know the damage any spill can cause.	Thank you for your comment.
Ch13-314	Barbara Hughes	I have seen what a small oil spill does to the plants and animals in a body of water. It covers an amazingly large area with death and destruction. Please don't put your whole territory at risk.	Thank you for your comment.
Ch13-315	Jim Steitz	We must not place the Salish Sea at imminent and continuing risk of oil spills. This precious ecosystem and its concentrations of marine mammals, including a vital and irreplaceable resident population of killer whales, would succumb to suffocation by hydrocarbons, when the law of probabilities finally catches up to this facility.	Additional information regarding potential impacts on Southern Resident killer whales is provided in Section 3.5 of this Final EIS.
Ch13-316	Katherine Babiak	And all of us have witnessed the devastation of oil leaks throughout the world, which oil companies are unable to prevent or clean up after.	Thank you for your comment.
Ch13-317	Kelly McConnell	Even if you didn't consider the various fishery jobs that would be destroyed by an oil or chemical spill, the damage to our tourism	Thank you for your comment.

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		and our food supply would be devastating. I do NOT see that as an acceptable risk.	
Ch13-318	Dennis Barnes	The point of the Exxon Valdez experience is there is no recovery from a petroleum accident either environmentally or financially. This project increases the probability of an accident beyond what the community of Anacortes should have to bear.	Thank you for your comment.
Ch13-319	Patrick Hesselmann	The environment of the proposed changes to the Tesoro Anacortes refinery is very delicate, and must be preserved from harmful spills and other chemical effects.	Thank you for your comment.
Ch13-320	Thomas Talbot	Although I didn't write the rest of this letter, it is only because I am short on time rather than short on desire to keep chemical spills from happening.	Thank you for your comment.
Ch13-321	Alta Toler	It is not if, but when, there will be an accident or a spill. I do not feel Tesoro is qualified or prepared to handle this once it happens. Clean up, if it can be accomplished, is grossly expensive.	<p>In the event of a spill, response organizations, including those contracted by the refinery or the independent vessel owner, would be deployed to respond to the spill and minimize potential impacts. In the marine environment, mixed xylenes and reformate evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills (see Section 13.5.7 of the Draft EIS).</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The</p>

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			<p>GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>The proposed project is designed with secondary containment systems to contain spills at the refinery and spill detection devices to alert workers in the event of a spill. The system was designed such that spills within the developed portions of the refinery would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's wastewater treatment plant. If the containment failed or a spill occurred outside of containment, response measures would be implemented to control the spill to prevent impacts.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 <p>The refinery's existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating the spill prevention and response is provided in Table 2 in Section 3.1</p>

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			of this Final EIS. Additional information regarding vessel traffic, marine spills, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-322	Chris Wolfe	We don't need 10s and 100s of new barges in the Salish; we need to kick our addiction to these toxic substances. Imagine a spill endangering the salmon, orcas, and human beings that share this habitat, not to mention the 1000s of less charismatic, or 'invisible' species that support this delicate ecosystem.	Thank you for your comment.
Ch13-323	Liza Michaelson	Xylene is a very dangerous and volatile substance. It has no place in our fragile ecosystem, so please don't invite it in!!..We can't afford the risk it poses to our endangered salmon, orcas, and first responders if there is a spill.	Thank you for your comment.
Ch13-324	Mully Mullally	But, for the record...I just want to ask that this NOT be what Tesoro perpetuate in our waters....Taking into consideration the possibility of spills and their potential damaging impact would be a step in the right direction..	Thank you for your comment.
Ch13-325	Beverly Faxon	...the risks of the economic and environmental destruction caused by a potential xylene spill are not worth any minimal benefits (accrued almost solely by Tesoro, not the community at large).	Thank you for your comment.
Ch13-326	Rebecca Canright	I am worried about ...the increased tanker traffic on the Salish Sea that will be created by further export. Tanker traffic increases the risk of dangerous spills and accidents.	<p>Potential impacts from the increased tanker traffic and increased risk of spills are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine vessel traffic – Section 13.3 • Vessel safety – Section 13.4 • Marine spills and spill response – Section 13.5 • Cumulative impacts from increased tanker traffic, including vessel traffic, vessel safety, and spill likelihood – Section 13.6 <p>Additional information regarding marine transportation, including potential spills, is provided in Section 3.9 of this Final EIS.</p>

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Ch13-327	Dave Popoff	<p>Please include the following cumulative impacts in the scope of the EIS:</p> <ul style="list-style-type: none"> - The direct, indirect and cumulative impacts resulting from increased marine oil shipping (five tankers and barges per month) in the Salish Sea; 	<p>The potential direct, indirect, and cumulative impacts resulting from increased marine vessels are discussed in the following chapters of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Chapter 4 • Marine birds – Chapter 6 • Marine and nearshore resources – Chapter 7 • Human health – Chapter 9 • Land use and shoreline use – Chapter 10 • Social and economic environment – Chapter 11 • Cultural resources – Chapter 12 • Marine transportation – Chapter 13 <p>Cumulative impacts are discussed at the end of each chapter before the reference section. The increase in marine vessel traffic as a result of the proposed project is discussed in Section 13.3 of the Draft EIS.</p>
Ch13-328	Dennis Robben	the Sound has enough pollutants in it - we don't need to add more chemicals and tankers	Thank you for your comment.
Ch13-329	George Reeves, Rosann Wuebbels	While I applaud your proposal that includes new equipment and infrastructure to produce and store mixed xylenes, to remove more sulfur compounds from gasoline in order to make cleaner fuels, and to capture vapors from marine vessels that would come to the Tesoro Anacortes refinery dock. What I do NOT want is your proposal that also includes adding up to five marine vessels per month to established lanes dedicated to industrial shipping activity. No to more ships.	Thank you for your comment.
Ch13-330	Tim Colton	I am opposed to this upgrade at the Tesoro plant because it would increase the marine vessel traffic in the Salish Sea and, more close to home, Padilla Bay.	Thank you for your comment
Ch13-331	Maradel Gale	The production at Tesoro would mean additional ships in the Salish Sea, which is already overloaded with noisy tankers.	The increase in marine vessel traffic as a result of the proposed project is discussed in Section 13.3 of the Draft EIS. The potential impacts of noise are discussed in the following sections of the

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			<p>Draft EIS:</p> <ul style="list-style-type: none"> • Wildlife and marine life – Sections 6.4 and 7.4 • Increased traffic – Section 9.4.2 • Proposed project and vessel noise – Section 9.5.2 • Aesthetics and views – Section 10.5.2 <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-332	David Arntson	No more tanker traffic in the Salish Sea.	Thank you for your comment.
Ch13-333	LeeAnn Chastain	There are already far too many large oil and gas vessels passing between the San Juan Islands and the mainland, as well as more passing to the west of the San Juans.	Thank you for your comment.
Ch13-334	Dan Belcher	This project will bring increased tanker traffic to an already over-burdened ecosystems of the San Juan Islands, Padilla Bay, and the Salish Sea.	<p>The increase in marine vessel traffic as a result of the proposed project is discussed in Section 13.3 of the Draft EIS. The potential impacts resulting from increased marine vessel traffic through the San Juan Islands and the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine birds – Sections 6.4.2 and 6.4.3 • Special status terrestrial species – Section 6.5 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3
Ch13-335	Marnie Pennington	Living on Samish Island - I am apposed to any additional freight traffic to be added into our precious Puget Sound.	Thank you for your comment.
Ch13-336	Lise Grace	This refinery would bring an additional five tankers per month through the Salish Sea, impacting native wildlife, especially the endangered resident orca population.	<p>The potential impacts on wildlife and marine life resulting from increased marine vessel traffic through the San Juan Islands and the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Wildlife and marine birds – Section 6.4.2 • Marine life including the Southern Resident killer whale –

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			<p>Section 7.4.2</p> <p>Additional information regarding potential impacts to wildlife, marine birds, and marine life, including the Southern Resident killer whale, is included in Sections 3.4 and 3.5 of this Final EIS.</p> <p>Details about control measures that would be taken to protect wildlife and marine life, including the Southern Resident killer whale population, from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Wildlife and marine life – Sections 6.4 and 7.4 • Vessel safety and waterway management – Section 13.4.1.2
Ch13-337	William McPherson	Vessel traffic should not have a net increase	Thank you for your comment.
Ch13-338	David M Scheer	Tesoro's 'plan' is to produce 15,000 barrels of xylene per day for export to Asia, which would bring FIVE more tanker ships a month through the already overloaded Salish Sea!!	Thank you for your comment.
Ch13-339	Stacy Oaks	The increase in tanker traffic will be significant to marine life and air quality.	Thank you for your comment.
Ch13-340	Anonymous	I feel the increased traffic in the waterways around Anacortes is not worth the limited benefits from the CPUP.	Thank you for your comment.
Ch13-341	Wendy Courtemanche	I am concerned about additional tanker traffic with the risks that poses of vessel strikes, noise, and wakes...	<p>The Draft EIS discusses potential impacts from vessel strikes, noise, and vessel wakes in the following sections:</p> <ul style="list-style-type: none"> • Vessel strikes on marine life – Sections 6.4.2.3, 7.4.1.2, and 7.4.2.3 • Noise during construction and operations on marine life and wildlife – Sections 6.4.1.4, 6.4.2, 7.4.1.5, and 7.4.2.6 • Noise on environmental health – Section 9.3

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			<ul style="list-style-type: none"> • Vessel wakes and speed – Sections 6.4.1.4, 6.4.2.3, 7.4.1, 7.4.1.2, 7.4.1.3, 7.4.2.2, and 7.4.2.3 <p>Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-342	Wendy Courtemanche	We need to continue to look at cumulative impacts from other projects being proposed in the region that would also increase tanker traffic, such as the Kinder Morgan Trans-Mountain pipeline expansion.	<p>Each resource chapter in the Draft EIS (Chapters 3 through 13) discusses cumulative impacts. Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6. In addition, reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2, including the Kinder Morgan Trans Mountain Pipeline Expansion project and others with the potential to impact resources in the study area.</p> <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating the piloting of vessels is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-343	Phyllis Dolph	I have spoken today especially on the effect of sound and beauty, but there are many more important issues about added tankers as well.	Thank you for your comment.
Ch13-344	Ron Metcalf	Tesoro's Draft Environmental Impact Statement (DEIS) has a number of deficiencies and omissions. For all of us who live in the Salish Sea, a major concern is the proposed project's increase of 60 additional tankers and Articulated Tug and Barges (ATBs)-- that's 120 additional transits each year. However, do these additional vessel transits include the vessels that would be used to back haul gasoline blendstock to the west coast refineries that supply the reformat?	The 120 additional vessel transits include the vessels that would be used to backhaul gasoline blendstock to the West Coast refineries that supply the reformat. The Draft EIS discusses the number of vessel transits in Section 2.8.2.
Ch13-345	Tom Decker	The added marine traffic noted in the DEIS is minimal. Another	Thank you for your comment.

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		significant consideration is the fuel efficiency and lower environmental impact of water-borne shipment versus other modes of transport.	
Ch13-346	Ruth LeBrun	BOTTOM LINE: We do NOT need increased marine ... traffic carrying toxic substances that risk the fragile air, water and land habitats of Fidalgo Island and Skagit County.	Thank you for your comment.
Ch13-347	Anonymous	Require the FEIS to separate vessel counts by products transported.	Section 2.8.2 of the Draft EIS states the approximate number of vessels for each product type. Additional information regarding vessel type and traffic is provided in Section 3.9 of this Final EIS.
Ch13-348	Jared Howe	This refinery would bring an additional five tankers per month through the Salish Sea, which endangers native wildlife and opens doors for toxic spills and oceanic pollution.	Thank you for your comment.
Ch13-349	Phyllis Dolph	With adding 61 tankers per year -- tugboats -- the proposed addition of 34 additional tankers per month or 408 per year -- as part of Kinder Morgan, the whale watching industry, ferry boats and oil tankers already there -- it is likely that our orcas will gradually become extinct.	<p>Potential impacts on Southern Resident killer whales as a result of increased vessel traffic associated with the proposed project are discussed in Section 7.4 of the Draft EIS. Cumulative impacts from increased vessel traffic on Southern Resident killer whales and other marine resources are discussed in Section 7.7. Reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS, including projects that could lead to increased vessel traffic in the study area.</p> <p>Additional information regarding potential impacts on Southern Resident killer whales is provided in Section 3.5 of this Final EIS.</p>
Ch13-350	Phyllis Dolph	The DEIS does not adequately address the noise produced by routing boat traffic, marring the Salish Sea's beauty -- as Stephanie was talking. I have spoken to -- especially on the effect of sound and beauty. But there are many more important issues about added tankers as well.	Potential impacts from vessel noise are discussed in Section 9.5.2 of the Draft EIS, and additional information regarding noise and whales is provided in Section 3.5 of this Final EIS.

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Ch13-351	Libby Mills	I support a reduction in tankers carrying oil and other toxic compounds from March Point and towards sensitive marine waters.	Thank you for your comment.
Ch13-352	Evelyn Adams	Additionally, the increased tanker traffic in an already over-burdened area filled with at-risk species (e.g. rockfish, Chinook salmon, Orca whales) requires a consideration of the cumulative impacts of projects in the offing (such as the Kinder Morgan pipeline expansion) as well as Tesoro's shipping of xylene. If more tankers are to be added to the already heavily-trafficked Salish Sea, the EIS must require an adequate disaster response plan with mitigation measures, if indeed an adequate response is even possible.	<p>Each resource chapter in the Draft EIS (Chapters 3 through 13) discusses cumulative impacts. Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6. In addition, reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2, including the Kinder Morgan Trans Mountain Pipeline Expansion project and other projects that could lead to increased vessel traffic in the study area.</p> <p>The Draft EIS discusses cumulative impacts from increased vessel traffic on marine and terrestrial species in the following sections:</p> <ul style="list-style-type: none"> • Marine birds – Section 6.6 • Southern Resident killer whales and other marine resources – Section 7.7 • Vessel safety, waterway management, spill likelihood (increased spill risks) – Section 13.6 <p>The refinery's existing spill prevention and response plans, including the oil spill contingency plan, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of oils and hazardous substances, including mixed xylenes, are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation and response plans is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Details about spill response plans, control measures, and safety practices along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the

ID	Contact	Comment Text	Response
			<p>refinery and wharf – Section 2.7.6 and Section 2.8.5</p> <ul style="list-style-type: none"> • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7
Ch13-353	Anne Elkins	<p>I urge you to revisit the DEIS in consideration of the very real danger of allowing barges through these fragile waters without Washington State Pilot escorts. Anacortes has a marine economy consisting of several thriving marinas, boat builders and sellers, and the SVC Marine Technology Center, an economy that provides hundreds of jobs to this city.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2

ID	Contact	Comment Text	Response
			<p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9 of this Final EIS.</p>
Ch13-354	Carol Thibeau	<p>EIS draft did not include; ... Impact on vessel traffic</p>	<p>Chapter 13 of the Draft EIS discusses the potential impacts on vessel traffic, safety, spill likelihood, and cumulative traffic impacts when multiple projects are considered. Additional information regarding the agencies responsible for regulating vessel traffic is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-355	Martha Hammer	<p>1. What is the risk to marine life in the Salish Sea from all the increased planned vessel traffic?</p>	<p>The Draft EIS discusses the increase in vessel traffic as a result of the proposed project in Section 13.3. Potential impacts on marine life from increased vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Fish, mammals, and other marine wildlife – Section 7.4 • Marine birds – Section 6.4
Ch13-356	Jan Gordon	<p>We need to look at cumulative effects of this project with others in the region. Vessel traffic for one. This will add 120 tanker trips per year. Kinder Morgan plans to add 34 trips per month. Noise, wake, leaks, possible spills, collisions all need more study. The size of the tanker needs to be looked, and assurances that tug escorts are required in this sensitive area. And low speeds. What is the effect on endangered orcas, recreation, ferry traffic, erosion from wakes.</p>	<p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6. In addition, each resource chapter in the Draft EIS (Chapters 3 through 13) discusses cumulative impacts.</p> <p>The proposed project would transport xylenes and reformate using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials, including xylene and reformate, would require</p>

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			<p>tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section 7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.</p>
Ch13-357	Cheryl Harrison	I have some concerns regarding the Tesoro Anacortes Xylene Proposal. As stated in the draft EIS, this project would bring additional tanker traffic to the Salish Sea.	Thank you for your comment.
Ch13-358	Cheryl Harrison	Please require the final EIS to hold Tesoro to the highest standards during the transport, refining and shipping of this very toxic Xylene.	Thank you for your comment.
Ch13-359	Eddy Ury	So, also very concerned about vessel traffic increases from moving	The Draft EIS discusses the increase in vessels as a result of the

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		<p>xylenes and reformate from Salish passages. This brings grave risks, especially when cumulative impacts of overall traffic increases from other projects are accounted for.</p>	<p>proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety in Section 13.6. The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality – Sections 4.4.3 and 4.4.4 • Marine birds – Sections 6.4.2 and 6.4.3 • Special status terrestrial species – Section 6.5 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Human health – Sections 9.3.2, 9.5.2, and 9.6.2 • Land and shoreline use, recreation and view – Sections 10.3.2, 10.4.2, and 10.5.2 • Public services – Section 11.4.2.4 • Treaty and traditionally used resources – Section 11.5.2.3 • Economics/employment income and tax receipts – Sections 11.5.2.4 and 11.6.2.2 • Minority and low-income populations – Section 11.7.2 • Cultural resources – Section 12.4.2 • Vessel traffic, safety, and spills – Sections 13.3.2, 13.4.2, and 13.5 • The Draft EIS discusses cumulative impacts from increased vessel traffic in the following sections: <ul style="list-style-type: none"> • Air quality and climate change – Sections 4.7 and 4.8 • Marine birds – Section 6.6 • Southern Resident killer whales and other marine resources – Section 7.7 • Human health – Section 9.7 • Land and shoreline use, recreation and visual resources – Section 10.6 • Cultural resources – Section 12.7 • Vessel traffic, vessel safety, and spill likelihood – Section 13.6 <p>Additional information regarding vessel traffic is provided in Section 3.9 of this Final EIS. Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Ch13-360	Martha Hall	1. Shipments of reformato to Tesoro. How many vessel trips yearly will occur to bring the estimated 6,716,000 bbl to the refinery? I didn't find this in the EIS.	The number of vessel trips carrying reformato yearly can be found in Section 2.8.2 of the Draft EIS. Additional information regarding vessel traffic is provided in Section 3.9 of this Final EIS.
Ch13-361	Martha Hall	17. Tesoro and other oil companies have fought having to have tug escorts. They have fought paving for them. Yet they millions each day. I have spent a lot of time lobbying for better tug escorts throughout the Salish Sea. I always end up fighting the lobbyists from the oil companies. They only do what they absolutely forced to do. They don't really care about the Salish Sea. This does not make them very good neighbors.	<p>The proposed project includes the transport of xylenes and reformato using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformato would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformato transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and</p>

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			navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.
Ch13-362	Libby Hazen	The addition of Xylene would greatly increase ...freighter traffic , threatening both marine life and human life.	Thank you for your comment.
Ch13-363	Roberta Hutton	7x more ships coming in all is very disturbing	Thank you for your comment.
Ch13-364	Patricia Resseguie	The production of xylene creates more pollutants. Most concerning is the increase in the transport of petroleum products in Fidalgo Bay and the Salish Sea. We already have a busy rail center. We do not need a Marine center to further endanger us and the environment.	Thank you for your comment.
Ch13-365	Anne Miller	Additionally, I think that the final impact assessment should address all boating activity. Right now it doesn't address impacts to recreational boaters. So, this includes like the impact that increased vessel traffic would have on like whale-watching boats; for example -- which is -- San Juan Whale Watching brings in about forty to fifty million dollar industry in recent years. It doesn't really include the impacts on the Washington State ferry boats, or it minimally addresses it. And those ferry services serve like a primary transportation for everyone on the island.	Additional information regarding recreational boating and potential impacts to ferry traffic is provided in Section 3.9 of this Final EIS.
Ch13-366	Sue O'Donnell	Increased vessel traffic on Guemes Channel worries me. We are assured of safety measures but what of the unknowns? Too, too, too risky for my family and yours.	Thank you for your comment.
Ch13-367	Joanne Schoettler	I'm only [unintelligible] concerned about the noise, the traffic of the additional -- it's only one tanker here, but we also have to remember that the Kinder Morgan pipeline at the Vancouver is also looking at that. And that's 700 times the amount of tankers that they have now, compared to if this pipe -- if that pipeline goes through	Reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2. The cumulative project list includes the Trans Mountain Expansion in British Columbia as well as other projects that could increase vessel traffic in the proposed project area.

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			Section 13.6 of the Draft EIS discusses potential cumulative impacts on marine transportation and spill likelihood.
Ch13-368	Georgianna Morgan	<p>3) with five extra tankers being employed to support, what measures are being taken a. to assure traffic on Puget sound is not disrupted by additional tanker traffic i.e. Ferries, commercial, military, personal...</p> <p>b. Vessels to be used meet Puget sound standards of compliance with USCG, OSHA, WISHA, ISO and other USA related methods of construction and inspection....not from some other country whose standards are much less than ours</p>	<p>The Draft EIS analyzed impacts to marine vessel traffic in Section 13.3.2.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformato would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug-barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would require that contracted marine vessel operators, including those responsible for transporting xylene and reformato transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, navigation of vessels, and marine vessel safety and compliance is provided in Table 2 in Section 3.1 of this Final EIS. Additional information</p>

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			regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.
Ch13-369	Christine Hansen	I am expressing my profound concern about Tesoro's wanting to begin producing and exporting xylene. This proposed project would mean more tanker traffic moving through the already crowded Salish Sea. It is estimated that adding even five more tankers per month would mean 60 additional tankers per year, resulting in increased risk of toxic spills, a rise in air and climate pollution, and the continuing threat of explosive oil trains in our communities.	Thank you for your comment.
Ch13-370	Julia Hurd	The effects of total cumulative tanker traffic should be taken into consideration, not only traffic from the xylene project. The study should also include proposed tanker traffic from the Kinder-Morgan Trans Mountain Pipeline from Canada. The Guemes Channel is narrow. And there is the fuel the ships use to consider, in addition to the cargo.	Reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2. The cumulative project list includes the Trans Mountain Expansion in British Columbia as well as other projects that could increase vessel traffic in the proposed project area. Additional information regarding spills of marine vessel fuels is provided in Section 3.9 of this Final EIS.
Ch13-371	Sigrid Asmus	I am thus profoundly concerned about protecting the Northwest Coast, and particularly the Salish Sea, from the present inadequate Draft Environmental Impact Statement, which fails to address many major threats that would arise from approval of the Tesoro corporation's proposed huge increase in transport of fossil fuels in the Salish Sea area, one historically noted for the danger its strong currents represent to all shipping.	<p>Safety requirements for shipping are discussed in Chapter 13 of the Draft EIS. During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the</p>

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			<p>weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section 13.3 and 13.4 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.</p>
Ch13-372	Sanford Olson	<p>The Draft EIS is deficient in several key areas. I request that the Final EIS address the following elements:</p> <p>Vessel Traffic, Product and Oil Spill Risk Analyses</p> <p>The vessel traffic assessment prepared specifically for this DEIS (Tesoro Anacortes Refinery Clean Products Upgrade Project Vessel Traffic Assessment) fails to address the cumulative impacts of the proposed Project’s vessel traffic along with other reasonably foreseeable increases in vessel traffic and/or changes in the use of the vessel traffic system in the Project’s study area.</p> <p>Citing current vessel traffic levels and historic traffic volume fluctuations is not a substitute for addressing the reasonably foreseeable future vessel traffic volumes, including both changes in vessel numbers, size, and cargos such as the increased transport of LNG and LPG which are also highly volatile and hazardous</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13 of the Draft EIS. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts. The cumulative project list includes the Trans Mountain Expansion in British Columbia as well as other projects that could increase vessel traffic in the proposed project area. Section 13.6 of the Draft EIS discusses potential cumulative impacts on marine transportation and spill</p>

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		<p>substances.</p> <p>Require the FEIS to include a comprehensive cumulative vessel traffic risk assessment that includes all reasonably foreseeable vessel traffic in the Project's vessel traffic routes, including those used for anchorages (which can include bunkering) and the transport of reformat to the Tesoro refinery from other west coast refineries and the backhaul of gasoline blendstock.</p>	<p>likelihood.</p> <p>To supplement the anchorage/bunkering discussion in Section 13.3 of the Draft EIS, additional information regarding anchorages and bunkering is provided in Section 3.8 of this Final EIS. Additional information regarding spills of marine vessel fuels is provided in Section 3.9 of this Final EIS.</p> <p>The Draft EIS describes the travel route for xylenes and the main travel route for reformat in Section 2.3 and on Figure 2-4.</p>
Ch13-373	Carol Sullivan	<p>Please help protect what we have from the dangers listed below.</p> <p>...</p> <p>Second, vessel noise impacts on whales are not adequately addressed, and the DEIS doesn't look at how additional tanker traffic in the region will affect both the whale watching industry and recreational vessel traffic.</p>	<p>Potential impacts from vessel noise are discussed in Section 9.5.2 of the Draft EIS, and additional information regarding noise and whales is provided in Section 3.5 of this Final EIS. Additional information regarding recreational boating and potential impacts to ferry traffic is provided in Section 3.9.1 of this Final EIS.</p>
Ch13-374	Mary Lynn Lyke	<p>I am very concerned about the potential outfalls of the xylene plant and the increased tank vessel traffic proposed.</p>	<p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery's WWTP, according to the requirements of the permit. Discharges from the refinery to the surrounding waters must be monitored and must adhere to chronic and aquatic life criteria defined by Ecology.</p>
Ch13-375	Carolyn Barney, Lyndon Greene	<p>My experience on the water has taught me what a precious jewel is the Salish Sea. It is a marvelous and wholly unique natural resource we must protect it without reserve. We must thoughtfully and gradually bring to an end the era of oil tankers in the Salish Sea. To do otherwise is simply going in the wrong direction.</p>	<p>Thank you for your comment.</p>
Ch13-376	Val Veirs	<p>I am pleased that Tesoro wants to lower sulfur fuels. That positive, however, will be negated by the many transits of tankers</p>	<p>Thank you for your comment.</p>

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		used to manufacture toxic xylene and then ship this dangerous product to Asia. Increased tanker traffic will increase the chance of a spill of xylene, propulsion fuel, and reformate. Increased vessel traffic also means more noise pollution which our marine species will have deal with.	
Ch13-377	Peggy Printz	Current vessel traffic is already at an unsustainable level, so no increase is acceptable.	Thank you for your comment.
Ch13-378	Janet Alderton	<p>“ES7.4. Terrestrial Vegetation and Wildlife & ES7.5. Marine and Nearshore Resources</p> <p>“During operations, the increased marine vessel traffic of 60 marine vessels per year could impact birds in the marine vessel transportation route from vessel strike, stress, and disruption of behavior due to vessels; damage to prey resources due to strikes or disruption; or damage to habitat due to marine vessel wakes (birds are the only wildlife considered in the marine vessel transportation study area). The potential impacts from the additional vessels are not considered significant as the vessel traffic due to the proposed project is 2.2 percent or less above current large marine vessel traffic levels in the study area.”</p> <p>Deficiencies in the Draft E.I.S.:</p> <p>An increase in vessel traffic of 2.2 percent is significant when combined with other proposed increases in large vessel traffic.</p> <p>I strongly object to each new project declaring that their seemingly small increase in vessel traffic is not significant. Cumulative increases do have significant impacts.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13 of the Draft EIS in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals).</p> <p>The Draft EIS discusses cumulative impacts on marine transportation from past, present, and reasonably foreseeable future actions including potential impacts on vessel traffic, vessel safety, and spill likelihood in Section 13.6. The potential cumulative impacts on specific resources resulting from increased marine vessel calls are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine transportation, including spills – Section 13.6 • Air quality – Chapter 4 • Marine birds – Section 6.6 • Marine life and nearshore resources – Section 7.7 • Environmental health – Section 9.7 • Land and shoreline use – Section 10.6 • Commercial and tribal fisheries – Section 11.8 • Cultural resources – Section 12.7 • Marine transportation – Section 13.6

ID	Contact	Comment Text	Response
			Additional information regarding cumulative impacts from increased vessel traffic is provided in Sections 3.8.1.6, 3.9.3, and 3.5.1 of this Final EIS.
Ch13-379	Karen Moskowitz	We already have a problem with increased shipping traffic. The additional tankers pose a great risk of pollution and environmental damage in a ecosystem already in distress.	<p>The likelihood and potential impacts associated with a spill in the Salish Sea are discussed in Section 13.5 of the Draft EIS. The increase in marine vessel traffic as a result of the proposed project is discussed in Section 13.3. Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill likelihood are discussed in Section 13.6.</p> <p>Spill prevention and response measures are described in the Draft EIS in the following sections:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 <p>For safety, marine vessels are typically operated at low speeds in sheltered areas, and this would help to reduce the intensity of wakes in these areas. To protect whales, NOAA recommends measures for operators or large vessels to avoid marine mammal strike, such as listening to advisory notices and reducing speeds while in advisory zones or areas of high whale abundance. Standard BMPs to be implemented for marine vessel activities associated with construction of the proposed project include slow speeds for marine vessels.</p> <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood, and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-380	Janet Hedgepath	Any new increase of traffic should be prevented. At the very least, speed need to be reduced and tugs employed.	All project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway

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			<p>between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug-barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section E5.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>For safety, marine vessels are typically operated at low speeds in sheltered areas, and this would help to reduce the intensity of wakes in these areas. To protect whales, NOAA recommends measures for operators or large vessels to avoid marine mammal strike, such as listening to advisory notices and reducing speeds while in advisory zones or areas of high whale abundance. Standard BMPs to be implemented for marine vessel activities associated with construction of the proposed project include slow speeds for marine vessels.</p>
Ch13-381	James Tangaro	Vessel traffic will remain far below historical figures. Crude by rail capabilities at 3 refineries around 2012 significantly reduced vessel traffic. This reduction could be highlighted in the final EIS.	This topic is covered in Section 13.6.1.1 of the Draft EIS. Overall, projections of future vessel traffic volumes for the Salish Sea vary, and there is no consensus on projected future vessel traffic volumes in the study area. The Draft EIS indicates that tanker traffic in the study area is forecasted to remain relatively flat or to decline based on a 2014 vessel traffic risk assessment completed for the proposed Gateway Pacific Terminal project (Glosten 2014b).

ID	Contact	Comment Text	Response
Ch13-382	Elena Rumiantseva	<p>The recently released EIS indicated that the tanker traffic would increase in the region. The project would bring an additional 5 tankers per month (60 per year) through sensitive marine habitat in the San Juan Islands and the Salish Sea. These tankers would carry both reformate (a crude oil product used to produce xylene) and xylene. This is in addition to the 34 additional tankers PER MONTH proposed as part of the Kinder Morgan Trans Mountain Pipeline expansion.</p>	<p>Thank you for your comment.</p>
Ch13-383	Jacob Pederson	<p>Another recommended alternative is a way to implement strategies to minimize the dangers to marine life. I am sure you have had a lot of comments about oil spills, but this increased risk can be substantially mitigated without not implementing the project at all. Tesoro will be using tankers that are just under the safe limit of tankers required to have tugboat escorts as they are towed to the Straits of Juan De Fuca through the complex channels of the Upper Puget Sound. You acknowledge the existence of another option; barges, more specifically, Articulated Tug Barges, to replace the tankers, saying that they are adequately regulated. This statement has a few holes however. ATB's are not required to have 2 pilots in the tug boat(s) pulling them. This can be a problem since more than one pilot cuts down on the human error factor. There is also a rule that 2 tankers cannot come through the Straits of Juan De Fuca at once, but there is not such rule for the ATB's, and they will be carrying the same material, so a collision would be just as disastrous as a tanker spill. The alternative of requiring tankers, not ATBs to be used, with tug escorts despite the regulations on the grounds that the strong tidal currents and winds ripping through the channels may not be present where the current regulations are more effective at mitigating oil spill risk. If anything, write the alternative so that the tankers will have to at least have tug escorts through Gueme's Island Channel, the riskiest spot along the proposed routes.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2

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			<p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-384	Ron Metcalf	<p>The proposed project's impacts to WA State Ferries (WSF) are only minimally addressed. In 2016, there were 11,879 sailings to and from the WSF ferry terminal in Anacortes. That's 11,879 ferry crossings of Tesoro's transportation route in Rosario Strait (source: San Juan County Ferry Advisory Committee). A disruption that impacts the Anacortes Ferry Terminal's ferry routes to the San Juan Islands could be devastating even for just a few days. Ferries are the marine highway and primary transportation route for islanders and island visitors. Grocery stores, that receive all their merchandise via ferries, have only approx. 2 and 1/2 days' worth of food in stock.</p> <p>Require the Final EIS to fully address the impacts to WSF sailings to and from the Anacortes Ferry Terminal and any impacts that could result from ferry traffic disruptions.</p>	<p>The Draft EIS discusses ferry traffic transits and potential impacts on ferry traffic in the following sections:</p> <ul style="list-style-type: none"> • Number of ferry transits – Section 13.3.1 • Potential impacts on vessel traffic including ferry traffic – Section 13.3.2 <p>Additional information regarding the proposed project's potential impacts on the ferry system is provided in Section 3.9 of this Final EIS.</p>
Ch13-385	Stephanie Buffum	<p>Today's Draft Environmental Impact Statement is impacting all eight million people that call the Salish Sea home -- not just us, but the 113 endangered species here in Canada and in the United States. The safe passage of all of our waters is of paramount concern, and we need to address the impacts based on the most extreme conditions that could be happening. With that, I would like to focus my attention to four comments, specifically around the marine vessel anchorage portion of the Draft Environmental Impact Statement. I'd like to require that this DEIS identify the status of all codified anchorages in the area that would be utilized. We'd like to see a requirement to address the use of anchorages for storage facilities. When refineries are at capacity, the</p>	<p>Section 13.3.1.3 identifies anchorage areas near the proposed project area, including marine vessel capacity, duration of maximum stay, and radius. The effects of anchoring associated with the proposed project are discussed in Sections 7.4.1.1 and 7.4.2.1 of the Draft EIS, respectively. Marine vessel anchorage data is discussed in Section 13.3.1.3.</p> <p>Additional information regarding the agencies responsible for regulating anchorages, spill prevention, and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding anchorages is provided in Sections 3.8.1 of this Final EIS.</p>

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		<p>anchorage are frequently used as areas that these fossil fuels and xylenes would be stored. We'd like to see that the FEIS model spills at all proposed anchorages work on [unintelligible] could take place, and model spills for all project-related vessels while at anchor.</p>	
Ch13-386	Ron Metcalf	<p>I live on Lopez Island. I come frequently through Anacortes for many of the essential items that we live with and far too many doctor's appointments. If any disruption -- or the additional traffic of 60 additional tankers and the 120 trips a year is significant in its small way -- it's incremental -- like somebody else mentioned earlier, if there's a spill, the impacts to our economy and our residents and the San Juan Islands will be significant. I was really surprised to see on the social and economic analysis that San Juan County is not included in the information that they drew from to do the analysis. The proposed impacts -- project's impacts to the Washington State ferries are only minimally addressed. In 2016, there were 11,879 sailings to and from the Washington State ferry terminal. That's 11,879 ferry crossings of Tesoro's transportation route in the Rosario Strait. The disruption -- it impacts -- the Anacortes ferry terminal's ferry routes to the San Juan Islands would be devastating, even for a few days. Where they say like -- they refer to three days isn't a big deal. But the grocery stores maintain -- if they say that they have enough food for two to two and a half days. And so a disruption of three days is significant for us. So, anyways, I was surprised to see that San Juan County wasn't included in the information; and I would hope they could include that in their final address.</p>	<p>Additional information regarding the proposed project's potential impacts on the ferry system is provided in Section 3.9 of this Final EIS.</p> <p>The Draft EIS discusses cumulative impacts from marine vessel traffic in Section 13.6. Potential impacts specific to ferry traffic are discussed in Section 13.3.2.</p> <p>Potential impacts on economic resources and environmental justice included San Juan County in the Draft EIS (see Section 11.2.1). Other potential impacts to San Juan County are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Chapter 4 • Terrestrial vegetation and wildlife – Chapter 6 • Marine and nearshore resources – Chapter 7 • Land use and shoreline use, including recreation and visual resources – Chapter 10 • Social and economic environment – Chapter 11 • Marine transportation – Chapter 13
Ch13-387	Bob Hall	<p>7. Cumulative impacts for vessel traffic seemed to be misunderstood.</p> <p>Cumulative is used for impacts that are not huge like Kinder Morgan. It actually is the small increases, from small projects, when added together,</p>	<p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6 of the Draft EIS. The analysis considered predicted incremental increases in addition to reasonably foreseeable future projects, such as Kinder Morgan.</p> <p>Project-related vessels would follow the established marine vessel transportation route through the Strait of Juan de Fuca</p>

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		<p>give us what we have today, a continuous armada of ships traveling through the Salish Sea. Has there not been a steady increase in ships of all kinds from projects generating traffic similar to this project?</p> <p>8. The impact of vessel traffic in Guemes Channel, Anacortes, and up the east side of Guemes Island needs to be looked at in the DE IS. How significant will this increase be?</p>	<p>and its approaches, Rosario Strait, Guemes Channel, and Fidalgo and Padilla bays (see Section 2.3 and Figure 2-4 of the Draft EIS). The Draft EIS discusses potential impacts of the proposed project's vessel traffic compared to historical data in Section 13.3.2.2, including Guemes Channel. The marine vessel transportation route does not include passage along the east side of Guemes Island.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>The refinery's existing spill prevention and response plans would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Washington State Department of Ecology, and USEPA. Additional information regarding the agencies responsible for regulating spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-388	Bob Hall	<p>13. Rescue tugs seem like a no-brainer but Tesoro and other oil companies have fought having to have them and fought paying for them. Requirements need to be in the project mitigation list. Getting this though the political system is difficult because of the amount of money Tesoro can spend on lobbying.</p>	<p>The Draft EIS discusses the rescue tug in Section 13.4.1.2. An emergency response towing vessel (the "rescue tug") is stationed in Neah Bay, staffed continuously, and available 24 hours a day, 7 days a week. In addition, both the refinery and the independent marine vessels contract with oil spill response contractors who could respond to an emergency towing situation. Rescue tugs would only be needed in a loss of propulsion or steering; tankships and ATBs have redundant and auxiliary steering and propulsion systems. The International Safety of Life at Sea Convention (SOLAS chapter 5.26) requires testing of the equipment prior to departure and prior to entry in the Salish Sea. In addition, Tesoro's contracted OSRO would be responsible for</p>

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			<p>supplying tug support (for example, to safely evacuate a crew or to provide support in the event of a steering failure) immediately if needed according to the OSCP (see Section 13.5.7 of the Draft EIS). Emergency tug support would be requested through the Coast Guard’s Captain of the Port who would be immediately contacted on VHF channel 16 (an Emergency channel monitored by the USCG and all shipping) in the event of an incident, as legally required under 33 CFR 153.</p> <p>Spill response measures are in place for the region. Pursuant to regional and national plans, Ecology publishes and maintains Geographic Response Plans (GRPs) for specific waterbodies. The GRPs identify sensitive resources and help direct response actions to protect sensitive resources in the first hours of spill response. In conjunction with GRPs, caches of spill response equipment are located throughout the Puget Sound region (see locations on Figures 13-8 through 13-11 of the Draft EIS).</p> <p>Spill prevention and response measures are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding spill response measures, regulations, and responsibilities is provided in Section 3.9 of this Final EIS.</p>
Ch13-389	Anne Elkins	The DEIS for the Tesoro Anacortes Clean Products Upgrade does not adequately discuss the methods of transportation for both the arrival of manufacturing feedstock to the refinery, or the export of the product from the plant. Use of barges is mentioned however, I have recently learned that barge traffic throughout Puget Sound	<p>The Draft EIS discusses the methods of transporting the proposed project’s feedstock and the mixed xylenes transported from the refinery in Section 2.8.2.</p> <p>During transits of the Salish Sea, tankships (including tankers and</p>

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		<p>does not require Washington State Pilot Boat escorts [a situation that needs to be remedied irrespective of this project!] The Tesoro project is not planning on using pilots for their barges. I was appalled to learn that the mixed xylene products from the proposed Anacortes will be transported by barge from the Tesoro refinery through Fidalgo Bay and Guemes Channel.</p>	<p>tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.</p>
Ch13-390	Jill Rand	This increase in Bakken Oil use (which comes from fracking, a process that is known by the EPA to pollute underground water	Thank you for your comment.

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		sources and involves releasing more toxic air to process) and shipping traffic, means up to five extra tankers a month entering and exiting Fidalgo Bay.	
Ch13-391	Martha Hall	<p>4. Cumulative impact of vessel traffic in the Salish Sea. It was interesting that this project was compared to the Kinder Morgan pipeline in B.C. Yes, that project and its huge impact on vessel traffic highlights the huge concern many of us have about the continuing increases in vessel traffic of all kinds. Tesoro's project is of the more insidious kind, the far more numerous projects that each adds a smaller number of ship, but they keep adding up. That is why cumulative impacts is so important.</p> <p>Canada and the U.S. cannot keep saying it is insignificant to add even the 60 more a year from this project. We have large and small increases from numerous sources.</p> <p>When do we hit the tipping point? That needs to be determined sometime. Statistics suggest we may have already hit that tipping point with our Southern resident orca population.</p>	<p>The Draft EIS considers future potential impacts in the cumulative impacts analyses in each resource chapter (Chapters 3 through 13). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals). Reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS. Cumulative impacts for marine transportation are discussed in Section 13.6 of the Draft EIS.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-392	Martha Hall	<p>6. Impacts of ships on Guemes Channel. Rosario Channel. and the anchoring area off the east side of Guemes Island. The EIS should look at these areas that are small,</p> <p>dangerous, and have strong currents. Tankers currently go from Anacortes north past Saddlebag Island, a very narrow slot full of rocky reefs. The current is strong. Guemes Channel is narrow. All of these areas have a lot of other boat traffic.</p>	<p>The Draft EIS discusses potential impacts of the proposed project's vessel traffic compared to historical data in Section 13.3.2.2, including Guemes Channel. The marine vessel traffic route does not include the east side of Guemes Island. Cumulative impacts on vessel traffic are discussed in Section 13.6 of the Draft EIS.</p> <p>Section 13.3.1.3 identifies anchorage areas near the proposed project area, including marine vessel capacity, duration of maximum stay, and radius. The effects of anchoring associated with the proposed project are discussed in Sections 7.4.1.1 and 7.4.2.1 of the Draft EIS, respectively. Marine vessel anchorages</p>

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			<p>are discussed in Section 13.3.1.3 of the Draft EIS. Additional information regarding anchorages is provided in Section 3.8.1 of this Final EIS.</p> <p>The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-393	Matthew Anderson	We should consider who will benefit if the xylene facility is denied...Boaters, commercial and sport, will benefit, as there will be less, huge tankers to dodge.	Thank you for your comment.
Ch13-394	Robert Gerfy	<p>I am especially concerned about:</p> <ol style="list-style-type: none"> 1. Increased tanker traffic in the Salish Sea, a national monument. 	<p>The Draft EIS analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3. The potential impacts from increased marine vessel traffic and likelihood of spills are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine vessel traffic – Section 13.3 • Vessel safety – Section 13.4 • Marine spills and spill response – Section 13.5 • Cumulative impacts from marine transportation – Section 13.6 <p>Additional information regarding marine vessel traffic and marine spill modeling, likelihood and response is provided in Section 3.9 of this Final EIS.</p>
Ch13-395	Elizabeth Heath	Also, any increased sea traffic involving fossil fuels needs to be	Thank you for your comment.

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		opposed.	
Ch13-396	Sharon Stroble	THE SAN JUANS are one of our jewels. Tesoro NEVER SHOULD have been allowed to have their tankers endanger these islands. Their desire to expand to yet another product will mean MORE TANKER TRAFFIC, and we already have far more than is appropriate, safe, or prudent.	Thank you for your comment.
Ch13-397	Valerie Rose	This toxic material is intended for export to Asia, increasing tanker traffic in the sensitive Salish Sea.	Thank you for your comment.
Ch13-398	Sally Stapp-Brigham	While Tesoro advertises just a few tankers per month taking xylene to Asia PLEASE take into account the cumulative impact of all of the Shell tankers and Tesoro tankers carrying all petroleum products to Asia.	<p>Cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions are discussed in Section 13.6 of the Draft EIS.</p> <p>The Draft EIS discusses cumulative impacts from increased vessel traffic in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change – Sections 4.7 and 4.8 • Marine birds – Section 6.6 • Southern Resident killer whales and other marine resources – Section 7.7 • Human health – Section 9.7 • Land and shoreline use, recreation, and visual resources – Section 10.6 • Cultural resources – Section 12.7 • Vessel traffic, vessel safety, and spill likelihood – Section 13.6
Ch13-399	Will Golding	Will this project lead to increased shipping through local waterways?	Vessel traffic associated with the proposed project would increase. Marine vessel traffic would increase by approximately 60 vessels per year as discussed in Section 2.8.2 of the Draft EIS.
Ch13-400	Sharon Levine	Marine traffic will increase and have impacts on Puget Sound that are unacceptable.	Thank you for your comment.
Ch13-401	Arlene French	If this project is allowed, then the most important mitigation would be the safety of the ships. They should have tug escorts, and	The Draft EIS discusses vessel safety, waterway management, and tug escort requirements. The Draft EIS discusses the

ID	Contact	Comment Text	Response
		the engines should be in top working order, with regards to noise emitted and no possibility of break downs.	<p>requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety and waterway management – Sections ES7.11.2 and 13.4 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>The proposed project includes the transport of xylenes and reformate using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). Tankships, including tug-barge and ATBs, carrying reformate and mixed xylenes would require tug escorts and Puget Sound licensed pilots within the study area in accordance with the Washington State Pilotage Act. Marine vessel safety and waterway management are administered by the USCG. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA.</p> <p>Additional information regarding the agencies responsible for regulating the piloting of vessels is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-402	Bob Zeigler	Your document states that the project would cause an increase in large marine vessel traffic of 2.2% and therefore impact on marine life would be minimal. However, when there are currently serious vessel impacts on marine life an increase of even1% can be significant.	<p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the analysis of impacts in each of the resource chapters. The analysis provides information on exactly why an impact was rated as significant or not.</p> <p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3. The potential impacts resulting from increased marine vessel traffic through the Salish Sea on marine life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine birds – Sections 6.4.2 and 6.4.3 • Marine life and nearshore resources – Sections 7.4.2 and

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			<p>7.4.3</p> <ul style="list-style-type: none"> Vessel traffic, vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5
Ch13-403	Sigrid Asmus	<p>I am also concerned that the project would bring an additional 5 tankers per month (60 per year) through sensitive marine habitat in the San Juan Islands and the Salish Sea. These tankers would carry both reformate (a crude oil product used to produce xylene) and xylene. Moreover, the proposed Tesoro project, in addition to new tanker traffic, would require an 34 additional tankers PER MONTH were the proposed Kinder Morgan Trans Mountain Pipeline expansion be allowed to take place.</p>	<p>Cumulative impacts from past, present, and reasonably foreseeable future actions on marine transportation, including potential impacts on vessel traffic, vessel safety, and spill likelihood, are discussed in Section 13.6 of the Draft EIS. The discussion in Section 13.6 included analysis of the Kinder Morgan project in Canada.</p>
Ch13-404	Julia Hurd	<p>If tank ships are used to transport xylene formularies and xylene, barges should accompany them no matter what size the ship is. If smaller barges are used, they should have pilots.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p>

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-405	Betsy Toll	The further risks of transporting this deadly substance, if production is permitted, are clear. Increasing the traffic of massive tanker ships through busy sea lanes in the Salish Sea east of Port Angeles poses serious danger to other ships including ferries in the region as well as to wildlife and ocean waters.	Thank you for your comment.
Ch13-406	Bruce Rustad	Tesoro has taken several steps to protect the waterways in our community and made sure that marine traffic will only increase minimally- no more than up to five marine vessels per month and will not exceed historical averages, according to the Draft EIS.	Thank you for your comment.
Ch13-407	Mike Sennett	I object to the Tesoro expansion on the grounds that it will increase ship traffic in the Salish Sea, increasing the probability of accidents (see GPT Vessel Traffic Study)	<p>The Draft EIS analyzed potential impacts from incidents (referred to as unplanned events in the Draft EIS), including fire, explosion, and spills to land and the marine environment. The potential impacts of unplanned events are described in the following sections of the Draft EIS:</p> <p>Spill likelihood and response, and summary of impacts of spills on environmental resources – Section 13.5</p> <ul style="list-style-type: none"> • Marine and nearshore resources – Section 7.4.3 • Unplanned events – Section 9.6 • Vessel traffic – Section 13.3.2.3 <p>Measures that reduce the risk of a marine vessel incident are</p>

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			<p>discussed in Section 13.4.1.2 of the Draft EIS, including vessel safety, waterway management, environmental safety, collision avoidance, and a requirement for having a licensed Puget Sound pilot aboard, among other measures.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-408	Xochi Rose	An additional 60 vessels (OIL TANKERS) per year constitutes a very large increase in tanker traffic and associated marine risks.	Thank you for your comment.
Ch13-409	Jolie Wheeling	. Xylene (pronounced ZIE-leen) is a highly volatile, hazardous and toxic petrochemical which has never before been manufactured in our region and transported through our waters. This project will require 120 ADDITIONAL annual tank vessel transits through the Salish Sea.	Thank you for your comment.
Ch13-410	Jim lombard	<p>sixth: Better mitigation of the impact of all vessel traffic through the Salish Sea.</p> <p>Solution: Require all project-related laden vessels of all sizes be escorted by tugs through the Salish Sea east of Port Angeles.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the</p>

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			<p>weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-411	Helen Moran	<p>Environmental impacts identified in the draft EIS:</p> <p>Increased tanker traffic: The project would bring an additional 5 tankers per month (60 per year) through sensitive marine habitat in the San Juan Islands and the Salish Sea. These tankers would carry both reformate (a crude oil product used to produce xylene) and xylene. This is in addition to the 34 additional tankers PER MONTH proposed as part of the Kinder Morgan Trans Mountain Pipeline expansion.</p>	Thank you for your comment.
Ch13-412	Sara Holahan	<p>ES7.11 Marine Traffic The EIS several times refers to the 2.2% increase of marine vessel traffic as if that makes it unimportant. It is still an increase, and the county should not allow it. Let Tesoro propose to reduce the traffic from some of their other shipments if that is what is needed for them to stay at current levels of industry</p>	Thank you for your comment.

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		but not expand.	
Ch13-413	Sally Stapp-Brigham	<p>Today five tankers are currently anchored in the space I see between Vendovi and Jack Islands. Yesterday these same five tankers were anchored and a sixth tanker was being escorted toward the refineries. There may be tankers also anchored out of my view behind Vendovi and/or Samish.</p> <p>This made me wonder about the Tesoro estimate of "approximately five additional tankers per month" that will bring a fossil fuel product to their refinery. They call it a "Clean Product Upgrade".</p> <p>Please look at this increase in tanker vessel traffic in light of the number of tankers & tug traffic currently here. How do we count the tankers that have been anchored for days & weeks? How many more tankers can safely anchor in the Salish Sea? Who keeps track of the number of tankers coming and going? Where does the garbage & sewage from those tankers at anchor go?</p>	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project compared to current levels in Section 13.3. Marine vessel anchorage data is discussed in Section 13.3.1.3. The effects of anchoring associated with the proposed project, including vessel waste discharges, are discussed in Sections 7.4.1.1 and 7.4.2.1 of the Draft EIS, respectively. Additional information regarding anchorages and the Vendovi Island area is provided in Section 3.8.1 of this Final EIS.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG's VTS maintains positive control of incoming and outgoing tankships, much like air traffic control (see Section 13.3.1.1 of the Draft EIS). The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Additional information regarding the agencies responsible for regulating marine vessel traffic is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-414	John Carrier	I applaud Tesoro's proposed Clean Products effort, but producing more volatile dangerous products in an increasingly more heavily populated region and increasing the shipping of tankers through the Salish Sea is a recipe for disaster.	Thank you for your comment.
Ch13-415	Lisa Nash Lawrence	Please do not allow Xylene to be transported through our Salish Sea (Straits of Juan de Fuca, Puget Sound, Rosario Strait, Georgia Strait, etc.). This will only increase tanker traffic in our waters - A	Thank you for your comment.

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		Marine Sanctuary - which is sound, sight and chemical pollution.	
Ch13-416	Jeffrey Jacobs	Xylene production in Anacortes will increase tanker traffic through the San Juan Islands where there is already a burdensome and dangerous amount of tanker ship traffic.	Thank you for your comment.
Ch13-417	Crystal McCown	<p>This Xylene product is high flammable, therefore I believe by shipping tanker volume it could be extremely explosive also.</p> <p>I do not believe the US had a safe transport plan or method in place for the oil or Xylene that would ensure no damage or injury to people or the environment.</p> <p>Research is needed and the transport plan and method needs to be developed and approved* by the populations exposed to these dangers. *Across states and international waters!!</p>	<p>The USCG's Puget Sound VTS maintains positive control of incoming and outgoing tankships, much like air traffic control (see Section 13.3.1.1 of the Draft EIS). In addition to the VTS, Section 13.4.1.2 of the Draft EIS discusses the policies, procedures, and organizations that manage safety and operations in the waterways within the study area, including tanker prohibitions, pilot and escort tug requirements, traffic separation, rescue tug, safety zones, security zones, and other requirements.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-418	Mary Kanter	<p>This plan is for Tesoro to produce 15,000 barrels per day of mixed xylenes, most of which will be exported to Asia for use in clothing, synthetic products and plastics.</p> <p>This will create more demand for Bakken oil, increasing fracking and increase in shipping traffic. Five extra tankers a month will be entering and exiting Fidalgo Bay.</p>	Thank you for your comment.
Ch13-419	Donald Power	I am writing to oppose the transportation of xylene to the Tesoro refinery in Anacortes primarily as this will increase the number of large ships transiting the confined waters around the refinery. Others have expressed the problems that xylene can cause for the environment, with which I concur, but I believe the increase in	Thank you for your comment.

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		traffic to be an additional real cause for concern.	
Ch13-420	Kathleen Lorence-Flanagan	7. Ship traffic. This is a scenario of “Death by a Thousand Cuts.” The impact of “120 total movements per year representing 2-3 vessel movements/week” is deemed “less than significant” in the DEIS. Rubbish! Each project, small or large increases the risk of explosion, of collisions, of damage to marine habitat including eelgrass beds (2nd largest along the entire west coast of North America), to marine life, and most of all to humans. Where is the tipping point?	Thank you for your comment.
Ch13-421	Glen Bruels	As you know, this is not the only proposal in the region that would result in a significant increase in shipping traffic of hazardous materials. While looked at individually, perhaps the likelihood of collisions, groundings, etc. remains low, but I suspect looking across all the proposals in the region, that percentage of likelihood would become more significant.	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions in Section 13.6.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology’s Office of Marine Safety. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic is provided in Section 3.9 of this Final EIS.</p>
Ch13-422	Skagit Audubon Society, Timothy Manns	<p>7. To further minimize the risk of spills en route to and from the refinery, Tesoro should commit to tug escorts for articulated tug barges.</p> <p>State law already requires tug escorts for tankers bound for the March Point refineries. At this writing, proposed state legislation (HB1611) that would add this requirement for articulated tug barges (ATB) has, we understand, not yet passed. At page ES-25, there is the statement, “Like other large vessels, the tankers and ATBs associated with the proposed project would require tug</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway</p>

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		<p>escorts and licensed pilots within the study area.” But at other points in the draft EIS it is not clear that this would, in fact, be the consistent or required practice. If Tesoro is truly committed to doing everything possible to eliminate the chance of a spill or other accident while still building and operating the proposed facilities, it should make a legally binding commitment to requiring a second tug with the articulated tug barges that would be transporting reformat to the refinery whether or not the state legislature enacts such a requirement. Under the present situation, if an ATB were to lose power in the Guemes Channel or among the San Juan Islands, collision or grounding and spill would be the very likely outcome.</p> <p>The final EIS must include a legal-binding commitment by Tesoro to requiring tug escort of ATBs in addition to tankers to minimize the risk of a catastrophic spill or explosion en route to or from the refinery.</p>	<p>between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>
Ch13-423	Diana Jordan-New	Tesoro has taken steps to protect the waterways in our community and made sure that marine traffic will increase minimally--no more than up to five marine vessels per month and will not exceed historical averages, according the Draft EIS.	Thank you for your comment.
Ch13-424	Bradley Fox	I strongly object to the proposed Tesoro Xylene plant project at Marches Point for the following reasons ...The increase in tanker traffic through the waters of the Salish sea.	Thank you for your comment.
Ch13-425	Amy Mower	Current vessel traffic is already at an unsustainable level, the Final EIS must provide that no increase is acceptable. Spill risk and orca impacts must be mitigated by, at a minimum, reduced speeds and	<p>The Draft EIS discusses spill likelihood in Section 13.5.6.</p> <p>The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive</p>

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		tug escorts.	<p>control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards. The Draft EIS discusses vessel speed related to erosion or wildlife disturbance from marine vessel wakes and speed in Sections 6.4.1.4, 6.4.2.3, 7.2.2.2, 7.4.1, 7.4.1.2, 7.4.2.2, 7.4.1.3, 7.4.2.3, and 12.4.1.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible</p>

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			for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.
Ch13-426	Carl Ullman	3. Cumulative effects – marine traffic. The DEIS indicates there will be a 2.2% increase in vessel traffic and concludes this is not significant. But this should be considered in the context of increasing traffic in the Salish Sea area. For example, the Kinder Morgan Trans Mountain Pipeline expansion project proposes to add 34 additional tankers per month. And there are numerous other projects proposed for the region. The DEIS must assess the immediate proposal in the broader context of other proposals and impacts currently on the drawing board. That is, after all, what the concept of “cumulative impacts” is intended to inform us about.	<p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6. In addition, each resource chapter in the Draft EIS (Chapters 3 through 13) discusses cumulative impacts. Reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2, including the Kinder Morgan Trans Mountain Pipeline Expansion project and others with the potential to impact resources in the study area.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating the piloting of vessels is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Vessel traffic is further discussed in Section 3.9 of this Final EIS.</p>
Ch13-427	Tulip Tribes, Kurt Nelson	Tulip Tribes recommends a more comprehensive assessment of vessel traffic impacts to the environment and Treaty-reserved rights. This assessment should take into account current and future traffic levels.	Sections 3.9 and 3.8 of this Final EIS include additional information on marine vessel traffic and treaty rights.
Ch13-428	Sandy Robson	The project would bring an additional 5 tankers per month (60 per year) through the sensitive marine habitat in the San Juan Islands and the Salish Sea. These tankers would carry both reformate (a crude oil product used to produce xylene) and xylene. Important to	Thank you for your comment.

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		note about the increase increase in vessel traffic is that this would be in addition to the 34 additional tankers per month proposed as part of the Kinder Morgan Trans Mountain Pipeline expansion project.	
Ch13-429	Anne Winkes	According to the DEIS the CPUP will bring increased marine vessel traffic to the Guemes Channel, with 60 additional vessels per year, 20 of which will be used for exporting xylene and 40 of which will bring mixed reformat into the refinery for the production of the xylene. The DEIS mentions that the increase in vessel traffic is only 2.2%, and tries to reassure us that that this percent of increase poses minimal risk of a spill actually occurring within the Guemes Channel. Given the size and maneuverability of the tankers, the increased use of recreational vessels in the channel and the small size of the channel itself, that is hardly reassuring.	Thank you for your comment.
Ch13-430	Washington Physicians for Social Responsibility, Bruce Amundson, Emily Peterson, Laura Skelton	<p>Vessel Traffic and Spill Risk: The DEIS does not adequately address or characterize the spill risk from this project. The project would bring an additional 120 tanker and barge trips per year through sensitive marine habitat in the San Juan Islands and the Salish Sea. These tankers would carry both reformat (a crude oil product used to produce xylene) and xylene itself (which is highly toxic and flammable).</p> <p>The DEIS indicates that this is only a 2.2% increase in traffic and is therefore insignificant. However, this increase is much more significant when looking specifically at the Guemes Channel, since it is a much higher risk area to negotiate and the project would lead to a much larger percentage increase in the traffic specifically heading to and from Anacortes. The DEIS also fails to account for the 35 additional tankers per month for the anticipated Kinder Morgan Trans Mountain Pipeline expansion project. These impacts should be looked at comprehensively in the final EIS.</p>	<p>The Draft EIS notes the relative increase in vessel traffic for the various locations of the marine vessel transportation route in Sections 3.3.1, 13.3.2.2, and Table13-9. The potential for increases in vessel traffic to increase spill risks is discussed in Section 13.5.6.</p> <p>The Draft EIS discusses spill likelihood and the results of the marine vessel spill modeling in Sections 13.5.5 and 13.5.6. The methodology, assumptions, and model result figures of scenarios for uncontrolled spills are presented in Sections 13.5.3, 13.5.4, and Appendix 13-B.</p> <p>Spill modeling, likelihood, and response are discussed in Section 3.9 of this Final EIS.</p> <p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6 of the Draft EIS. In addition, each resource chapter in the EIS (Chapters 3 through 13) discusses cumulative impacts. Reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in</p>

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			<p>Section 1.7.2.2, including the Kinder Morgan Trans Mountain Pipeline Expansion project and others with the potential to impact resources in the study area.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. Additional information regarding the agencies responsible for regulating the piloting of vessels is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Section 3.9 of this Final EIS includes additional information on marine vessel traffic and spill likelihood.</p>
Ch13-431	Swinomish Indian Tribal Community, Larry Wasserman	<p>5. Request for Conditioning of the Project.</p> <p>Without waiving any objections, Swinomish requests the applicant to accept a voluntary but binding SEPA and shoreline permit condition accepting the sixty ports of call as the upper limit of all vessel trips for the project. If the applicant is unwilling to accept this condition, the DEIS needs to disclose the estimated maximum number of ships for all vessels related to the project.</p>	<p>The proposed project does not include more than 60 marine vessels per year. Potential environmental impacts associated with additional marine vessels were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. Additional information regarding agencies responsible for regulating marine vessel trips is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Ch13-432	Virginia Wolff	<p>The DEIS acknowledges that other possible projects, such as the approved Kinder Morgan expansion in British Columbia, could contribute to increased tanker traffic in the study area in the future. The DIES also acknowledges that, while the added tanker and ATB traffic from Tesoro’s CPUP project contributes a relatively proportion of that total traffic, it would add to the cumulative impacts of that traffic. For the findings of “less than significant” impacts on oil spill risk, vessel congestion, threats to wildlife, etc. found in this DEIS to be valid over time, it is essential to place limits on the amount of increased marine vessel traffic permitted.</p>	<p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6 of the Draft EIS. In addition, each resource chapter in the Draft EIS (Chapters 3 through 13) discusses cumulative impacts. Reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts, including the Kinder Morgan project, are listed in Table 1-2 in Section 1.7.2.2.</p> <p>Vessel traffic is further discussed in Section 3.9 of this Final EIS.</p>
Ch13-433	Protect Skagit,	Impacts from Vessel Traffic and Spills	The proposed project includes the transport of xylenes and

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	<p>Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Waterway Management : Tug Escorts and Puget Sound Pilots Should Be Required for all New Vessel Traffic</p> <p>The DEIS is unclear on whether all project related tank vessels will be required to have tug escorts. The DEIS makes the following ambiguous statement (see page 240): “Assist tugs would provide maneuvering assistance to cargo vessels during transit and during mooring and unmooring operations.”</p> <p>Tug escorts are shown to be effective in the mitigation of accident and oil spill risks. The VTRA 2015 (VTRA 2015 Final Report Updating the VTRA 2010: A Potential Oil Loss Comparison of Scenario Analyses by Four Spill Size Categories) analyzed the risk mitigation measure to escort all laden oil barges and ATBs east of Port Angeles (OAERMM). The OAERMM analysis resulted in a 14.7% reduction in accident frequency across the study area (see page 185 http://www2.seas.gwu.edu/~dorpjr/VTRA_2015/REPORTS/VTRA%202015%20ECOLOGY%20FINAL%20REPORT%20%2001_09_17.pdf).</p> <p>The FEIS should clarify that if the project is approved all project related laden tank vessels (regardless of size/DWT) will be required to be escorted by tug(s) of sufficient power and maneuverability to assure safe transit through the Salish Sea east of Port Angeles.</p> <p>State licensed Puget Sound Pilots are most familiar with the unique characteristics and challenges of the US portion of the Salish Sea. If the project is approved, the FEIS should include binding mitigation (including conditions placed on Tesoro’s Shoreline Permit) that require all project related Articulated Tug Barges and other seagoing barges to be under the direction of a statelicensed Puget Sound Pilot.</p>	<p>reformate using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>
Ch13-434	Tesoro Anacortes Refinery, Rebecca Spurling	<p>Tesoro submits this letter, to assist Skagit County in clarifying the analysis of impacts from the CPUP, particularly in the following areas:</p> <ul style="list-style-type: none"> • Vessel traffic is trending down and even with CPUP vessel traffic, 	<p>As demonstrated in Table 13-8 of the Draft EIS, large vessel calls at the refinery have fluctuated substantially since 2002. The proposed project’s vessel calls would represent a substantial increase over 2014 activity, but would still be lower than pre-</p>

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		vessel traffic would be lower at the Refinery.	2008 activity.
Ch13-435	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>The study area of the DEIS is inappropriately narrow</p> <p>The study area omits all the vessel traffic routes used for the transport of reformat to the Tesoro refinery and the backhaul of gasoline blendstock. The study area omits all locations where anchoring, which could include bunkering, could take place.</p> <p>The FEIS must include all project related vessel routes, at least those within US territorial waters.</p> <p>High Volume Port Area</p> <p>33 CFR 155.1020 defines the "Strait of Juan De Fuca at Port Angeles, WA to and including Puget Sound, WA." as a High Volume Port Area (HVPA). Ecology's Marine and Rail Oil Transportation Study page 109 states that "In HVPAs, defined in 33 CFR 155.1020, the risk of a cargo spill is considered higher than normal because of a higher volume of shipping activity....To offset the increased risk in an HVPA, tank ships are required to have faster response times for each potential tier."</p> <p>The FEIS should include all regulations specific to the study area being a High Volume Port Area.</p>	<p>The Draft EIS discusses the study area in Section 13.2.</p> <p>Marine transportation, spill likelihood, and spill response are further discussed in Section 3.9 of this Final EIS.</p>
Ch13-436	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance,	<p>Address all boating activity and project impacts to all boating activity in the study area, including Washington State Ferries, cruise ships, recreational boats, and whale watch boats</p> <p>The DEIS addresses "public or nonproject commercial vessels or businesses" but fails to address impacts to recreational boaters with regard to the "increased delays and navigational complexity in waterways and facilities used by vessels not associated with the proposed project" (page 137). None of the tables in Chapter 13 summarizing the area's vessel traffic include recreational or whale watch boats.</p>	<p>Vessel traffic, including potential impacts to the ferry system and recreational boating, is further discussed in Section 3.9.1 of this Final EIS.</p>

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	Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge		
Ch13-437	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>Canadian Vessel Traffic Should Not be Excluded</p> <p>It is important that the VEAT data in the FEIS be updated to include 2016 data and include all Canadian vessel traffic data. The 2016 VEAT shows a significant increase in the number of tank ships bound for Washington ports via the Strait of Georgia and Haro Strait. This was a 200% increase over the same 2015 VEAT data, and the 2016 data far exceeds any historic traffic volumes. The majority, 88 of the 108 tank ship transits between Canada and the US were the TV (tank vessel) KIRKEHOLMEN making deliveries of aviation fuel from the Shell Anacortes Refinery to Vancouver BC. The Shell Refinery is also located on March Point, and the DEIS did not address this significant increase in tank vessel traffic at Tesoro's neighboring refinery.</p> <p>The FEIS should include an updated Table 136: Selected VEAT Data with 2016 VEAT data and the FEIS should address all Canadian vessel traffic data. In light of this new information the determination of nonsignificance should be reevaluated.</p>	<p>The Draft EIS analyzed cumulative impacts from marine transportation including from past, present, and reasonably foreseeable future actions on vessel traffic, vessel safety, and spill risks in Section 13.6. The text of Section 13.5.6 is incorrect regarding the proposed project's inclusion in the VTRA. As stated in Section 3.9.1.4 of the Final EIS:</p> <p><i>the VTRA did not evaluate how spill likelihoods would change solely with the addition of project-related marine vessel traffic (i.e., 120 total vessel movements per year carrying xylenes and/or reformate); however the VTRA did evaluate a scenario that included the proposed project (inadvertently described as the "Tacoma Anacortes Upgrade"), along with several other potential projects, generating 232 additional tanker and ATB trips from U.S. ports.</i></p> <p>Section 3.9.3 provides additional discussion of spill likelihood due to the proposed project.</p> <p>This analysis, based on the baseline and future scenarios and spill risk findings in the Final VTRA, includes vessels making calls at Canadian ports in the greater Salish sea. The Draft EIS considered cumulative impacts for each resource analyzed in Chapters 3 through 13 of the Draft EIS. In addition, reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2.</p>

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			<p>The spill risk estimates in the Final VTRA (the “VTRA II”), which are incorporated into Section 13.5 of the Draft EIS, incorporate the increased vessel traffic along with other factors, such as improved tanker design and navigation safety protocols.</p>
Ch13-438	Tesoro Anacortes Refinery, Rebecca Spurling	<p>B. Large Vessel Traffic is Trending Down and new CPUP Vessel Traffic would be Less than Recent Volumes at the Refinery.</p> <p>Vessel traffic is the cornerstone for much of the analysis in the DEIS, including spill risk and impacts to marine mammals, including the Southern Resident Killer Whale. Therefore, an understanding that CPUP vessel traffic would constitute, at best, a negligible addition to a long-term decline in vessel traffic is important to assessing the impacts throughout the DE IS.</p> <p>According to Ecology's VEAT database, large vessel traffic⁵ levels are trending down across the state and in Puget Sound. Across all state waters, large vessel traffic has been trending down since 1999.⁶ More importantly and also based on Ecology's VEAT database, large vessel traffic in Puget Sound has been trending down for many years, as reflected in Figure 1.7</p> <p>[Figure 1. VEAT Vessel Traffic Trends 2002-2016]</p> <p>In addition to these broader downward trends, even with new vessel calls generated by CPUP, vessel traffic at the Refinery will be lower than recent vessel traffic volumes. The average historical vessel traffic baseline for the last 13 years (2002 to 2015, excluding 2009-2010 when the economy reduced demand for production and the refinery was shut down for several months) averaged 346 calls per year. Projected vessel traffic under the proposed project would be about 294 calls per year, or about 52 fewer calls per year than the historical baseline, as reflected in Figure 2 below.⁸</p> <p>The DEIS recognizes that vessel traffic impacts are very minor.⁹ The FEIS could be improved, however, by more clearly drawing the connection between the negligible effect of CPUP vessel traffic on vessel traffic generally and the negligible likelihood of other</p>	<p>As demonstrated in Table 13-8 of the Draft EIS, large vessel calls at the refinery have fluctuated substantially since 2002.</p> <p>The spill risk likelihoods in the Draft and Final EIS, as cited from the Final VTRA, incorporate modeling of overall trends in tanker traffic volumes.</p>

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		<p>impacts. This includes the impacts of potential spills and impacts to the Southern Killer Resident Whale, as discussed below.</p> <p>[Figure 2. Historical and Forecasted Vessel Calls at Tesoro Anacortes]</p>	
Ch13-439	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>Increase in Vessel Traffic is Significant</p> <p>The DEIS minimizes the impact of project related vessel traffic by comparing it to historical volumes of vessel traffic. Table 139; Proposed Project Vessel Movements Compared to Historical Data (page 1315) compares project related vessel traffic with all large vessels and tank ships in the Strait of Juan de Fuca, the southern end of Rosario Strait, and Guemes Channel, concluding that “the marine transportation impacts from proposed project operations would be less than significant.”</p> <p>Table 13-8: Vessel Traffic Levels at the Tesoro Anacortes Refinery (page 1312) shows a total of 236 vessels in 2014. An additional 60 vessels would be a 25% increase, which is far more significant than the 0.1 – 2.2% increase in comparison to all large vessel traffic.</p> <p>The FEIS should define project related increased vessel traffic as the percentage increase in vessel traffic at the Tesoro Refinery or at a minimum the vessel traffic to March Point. In light of this revised calculation, the significance of the project impacts should be reevaluated.</p>	<p>The Draft EIS notes the relative increase in vessel traffic for the various locations of the marine vessel transportation route in Sections 3.3.1, 13.3.2.2, and Table13-9. The potential for increases in vessel traffic to increase spill risks is discussed in Section 13.5.6.</p> <p>The Draft EIS analyzed the increase in vessel traffic as a result of the proposed project in Section 13.3. The potential impacts resulting from increased marine vessel traffic are discussed in the resource chapters (Chapters 3 through 13) of the Draft EIS.</p> <p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6 of the Draft EIS. Reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2.</p> <p>Vessel traffic is further discussed in Section 3.9 of this Final EIS.</p> <p>As demonstrated in Table 13-8, large vessel calls at the refinery have fluctuated substantially since 2002. The proposed project’s vessel calls would represent a substantial increase over 2014 activity, but would still be lower than pre-2008 activity.</p> <p>As discussed in Section 13.3.2.2 of the Draft EIS, even if all 120 proposed project-related vessel movements were entirely new movements within the study area, total proposed project-related activity would result in an increase of 2.2 percent or less compared to current large vessel activity in the study area. The increase in vessel traffic as a result of the proposed project would represent a traffic increase of 0.1 percent, 2.2 percent, and 1.3 percent of large vessel activity within the three major waterways along the proposed marine vessel transportation route: the</p>

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			<p>Guemes Channel, the south end of Rosario Strait, and the Strait of Juan de Fuca, respectively (see Table 13-9). These numbers are based on an increase of 120 vessel movements for the proposed project as compared with historical data for large vessels transiting in and out of these waterways.</p>
Ch13-440	<p>Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>The Vessel Traffic Assessment makes the following questionable conclusions:</p> <ul style="list-style-type: none"> a. The vessel traffic management system for the Salish Sea is robust and has proven effective in preventing vessel related incidents and spills and has the capacity to accommodate the CPUP traffic. b. Existing passive and active mitigation measures are adequate for the anticipated volume of vessel traffic associated with the proposed action and other anticipated development in the study area. The most significant of those measures are the TSS and the CVTS, which result in most large vessels moving in one-way traffic lanes with active traffic management and mandatory position reporting by vessel crews. c. Vessel traffic levels in the study area overall and at the Refinery are below historical levels. d. The CPUP will increase the vessel traffic level by about 60 vessels annually, representing an increase of 2% in overall traffic compared to current VEAT measured levels. This is less than the average annual fluctuation in VEAT traffic data of more than 4% (plus or minus) per year. e. Vessels the size of the tankers and ATBs that will call at the Refinery already operate safely throughout the entire study area. f. Tankers and barges calling at Tesoro for the CPUP do not introduce any substantial new risk elements from the existing levels to the study area. <p>It is unknown whether or not the current vessel traffic management system for the Salish Sea will prevent vessel related</p>	<p>The objectives of the proposed project to improve the refinery's capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery's product mix are provided in Section 1.2 of the Draft EIS. The Draft EIS analyzed potential impacts from the manufacture and export of xylenes according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the magnitude, geographic extent, and duration of potential impacts. Each potential impact was analyzed according to the resource-specific criteria provided in Appendix 1-B and the supporting analysis of impacts in each of the resource chapters. Potential impacts from the manufacture and export of xylenes are discussed in Chapter 3 through 13 of the Draft EIS.</p> <p>Cumulative impacts from marine transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6 of the Draft EIS. The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13 of the Draft EIS. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future</p>

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		<p>incidents and spills given that the DEIS did not analyze the cumulative impacts of the proposed project's vessel traffic along with other reasonably foreseeable vessel traffic.</p> <p>Citing current vessel traffic levels and historic traffic volume fluctuations cannot be a substitute for addressing the reasonably foreseeable future vessel traffic volumes that include changes in vessel numbers and size (e.g., substantially larger container ships calling on both US and Canadian ports) and cargos (including the increased transport of LNG and LPG which are both highly volatile hazardous and noxious substances) in the entire project vessel traffic study area.</p> <p>Xylene is a highly volatile hazardous and noxious substance. The DEIS does not adequately address the significant adverse risks and impacts from the manufacture and export of xylene, nor the interaction of xylene with LNG and/or LPG should an accident occur between ships carrying two or more these highly volatile hazardous and noxious substances.</p>	<p>projects or actions are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine Transportation – Section 13.6
Ch13-441	Evergreen Islands	<ul style="list-style-type: none"> • How many vessels (tankers & barges) traverse the Salish each week? • How many vessels (tankers & barges) does the Tesoro refinery receive per week? • Will the number of vessels (tankers & barges) per week increase as due to the production of xylene? • How many xylene vessels (tankers & barges) per week increase as due to the production of xylene? • What type of “marine vessels” will be used to transport Xylene or constituent products? (e.g. tanker, barge (push or pull), ATB. • What are the size and holding capacity (in barrels) of the vessels used? • How often will these vessels be taking bunkers and where will this activity will occur? 	<p>Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.</p>

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		<ul style="list-style-type: none"> • Will the project proponents conduct a vessel traffic risk assessment? • Will the marine vessels be required to have tug escorts? If so, along what part of the waterway? • Will the EIS consider the cumulative impacts of the additional vessel traffic throughout the waterway with reasonably expected vessel traffic increases from other proposals? 	
Ch13-442	Liz Lovelett	<p>Additionally, I think that it is vitally important to make sure that the EIS and subsequent permitting take the increase in ground and vessel traffic very seriously. While it is only slated for five additional tankers, the cumulative impact of traffic on the pier must be considered. Many ecosystems and industries rely on a safe and healthy Salish Sea. This environment thrives best without the additional pressure that increased tanker traffic precipitates. Effects on local marine animals has the potential to impact fishing, shellfish cultivation, and many tourism trades such as whale watching and boat charters. Please keep these vital, multi-million dollar industries in mind while making your determination.</p>	Thank you for your comment.
Ch13-443	Orca Network, Howard Garrett	<p>We ask that the Final Environmental Impact Statement include:</p> <p>...</p> <ul style="list-style-type: none"> • A requirement that all project-related tank vessels of any size east of Port Angeles be piloted by locally experienced captains and escorted by tugs to provide safe transit through the Salish Sea. 	<p>The proposed project includes the transport of xylenes and reformate using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the</p>

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			<p>tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>Additional information regarding the agencies responsible for regulating tug escorts, pilots, and navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Vessel traffic, including tug escorts and piloting, is further discussed in Section 3.9.1 of this Final EIS.</p>
Ch13-444	Christa Simmons	d by tugs of sufficient power and maneuverability to assure safe transit through the Salish Sea.	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound</p>

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			<p>licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-445	Laurie Sherman	Another 120 vessel trips/year of barges and tankers full of toxic xylene and other toxic oil products, through the crowded and narrow passages of the Salish Sea -- inhabited by our endangered Chinook salmon and our endangered Southern Resident Killer Whales is just not acceptable.	<p>The Draft EIS discusses the potential impacts of the increase in vessels on vessel traffic as a result of the proposed project in Section 13.3. Potential impacts from increased vessel traffic on marine wildlife, including Southern Resident killer whales and salmon, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Southern Resident killer whales, salmon, and other marine resources – Section 7.4 • Vessel safety and waterway management are discussed in Section 13.4.1.2 of the Draft EIS. <p>Requirements for the safe marine transportation of mixed xylenes are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding marine transportation and the potential impacts on Southern</p>

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			Resident killer whales is provided in Sections 3.5.1 and 3.9 of this Final EIS.
Ch13-446	AJ Kuntze	I SUPPORT tugboat escorts for all tankers coming into and leaving March Point should this Project go forward.	Thank you for your comment.
Ch13-447	Gwen Hunter	We must protect the Salish Sea from more toxins & tankers! I grew up safely fishing for salmon that was healthy. The last time I fished I almost got run over by a tanker - my kids were terrified.	Thank you for your comment.
Ch13-448	Anonymous	We don't need more traffic. We don't need more noise.	Thank you for your comment.
Ch13-449	Deejah Sherman-Peterson, Ron Sherman-Peterson	Re: the xylene issue, we ask that no increase in vessel traffic be allowed on land and/or water.	Thank you for your comment.
Ch13-450	Deejah Sherman-Peterson, Ron Sherman-Peterson	In the water, besides the very real risks of spills, the increased tanker traffic will also have a detrimental effect upon marine life because of noise and other types of pollution (the fuel used by the boats being one example).	Thank you for your comment.
Ch13-451	Camille Meehan	Additionally, even if there is not a Xylene spill, increased vessel traffic poses increased risks of fuel spills. This is risky and affects commercial fishers, whale watchers, shoreline property owners and again ferry traffic to and from the San Juans.	Thank you for your comment.
Ch13-452	Steve Garey	FINALLY I AM SENSITIVE TO THE RISK RELATED TO AN INCREASE IN MARINE TRAFFIC VOLUMES. AN EVALUATION OF THE SMALL INCREASE PROPOSED SHOULD BE DONE TO INSURE THAT RISK CAN BE MINIMIZED. LARGER DOUBLE HULLED VESSELS WITH TUG ESCORTS SHOULD BE REQUIRED IN THE FINAL EIS FOR REFORMATATE AND XYLENE CARGOES THAT WILL RESULT IF THE PROJECT IS BUILT.	The potential impacts on vessel traffic and vessel safety from the increase in vessels as a result of the proposed project are discussed in Sections 13.3 and 13.4 of the Draft EIS. The Draft EIS analyzed the likelihood of a spill occurring based on the historical record and examined spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill. The likelihood and potential impacts associated with a marine spill in the Salish Sea are discussed in

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			<p>Section 13.5.</p> <p>MARPOL 73/78, Annex I, Regulations for the Prevention of Pollution by Oil, required all single-hull tankers in U.S. waters be phased out by 2015 and that all new tankers and tank barges be built with double hulls (see Section 13.1 of the Draft EIS).</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>Marine vessel safety and waterway management are administered by the USCG. Additional information regarding the agencies responsible for regulating tug escorts, pilots, and</p>

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			navigation of vessels is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including tug escorts and piloting, is provided in Section 3.9.1 of this Final EIS.
Ch13-453	Sigrid Asmus	Tesoro's plan to produce 15,000 barrels of xylene per day for export to Asia would bring an additional five tankers per month through the Salish Sea (that means ten trips). Each additional tanker or barge in the Salish Sea compounds the already crowded shipping traffic and increases the risk of spills of crude oil and other refined products.	Thank you for your comment.
Ch13-454	Sigrid Asmus	I am also concerned that the project would bring an additional 5 tankers per month (60 per year) through sensitive marine habitat in the San Juan Islands and the Salish Sea. These tankers would carry both reformate (a crude oil product used to produce xylene) and xylene. Moreover, the proposed Tesoro project, in addition to new tanker traffic, would require an additional _35 tankers PER MONTH_ were the proposed Kinder Morgan Trans Mountain Pipeline expansion be allowed to take place.	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions, including the Kinder Morgan project, in Section 13.6.</p> <p>Tankers associated with the Westridge Marine Terminal/Kinder Morgan pipeline expansion project could impact marine vessel traffic for xylene tankers associated with the project near the western portion of the Strait of Juan de Fuca at a point in the Strait of Juan de Fuca that is between the mouth of the Lower Elwha River and Port Angeles and westward (see Table 1-2 in Section 1.7.2.2 of the Draft EIS).</p> <p>Controls that would be in place to prevent or minimize impacts are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other</p>

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			<p>vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic is provided in Section 3.9 of this Final EIS.</p>
Ch13-455	Ellen Winter	<p>There are severe storms through here and lots of big oil tankers are in danger of going aground or sinking that there have been instances of sinking all over the world of these oil tankers</p>	<p>Thank you for your comment.</p>
Ch13-456	Ruth Van Doren	<p>For health and safety sake please adopt the suggestions for Safe Salish Sea and keep Xylene out of our waters</p>	<p>Chapter 13 of the Draft EIS describes the embedded controls related to marine vessel transportation and spills. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p>
Ch13-457	Allen Workman	<p>There is very little increase in ship traffic, so little as to not be noticed.</p>	<p>Thank you for your comment.</p>
Ch13-458	Kari Graydon	<p>I oppose the Tesoro Anacortes Xylene Proposal for many reasons, but will list the two major ones...</p> <p>It will bring increased Tanker traffic into the area, which will affect marine life.</p>	<p>Thank you for your comment.</p>
Ch13-459	Bill Bowman	<p>My concern is for the approximately 17,000 residents of Anacortes and those of the greater Skagit Valley region. I've raced sailboats and cruised the Salish Sea year round and have experienced adverse weather conditions that when combined with a few failures, (e.g. mechanical, human, etc.) can cause a cascade of events resulting in an accident.</p> <p>Please address further the probability of a tanker vessel accident in waters with restricted maneuverability such as Guemes Channel and Rosario Strait, especially since the Canadian Kinder Morgan pipeline will add an additional 34 tankers per month, or over 400 additional tankers per year. This combined with the 5 per month, or 60 tankers per year for the proposed Xylene Expansion Project,</p>	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions, including the Kinder Morgan project, in Section 13.6.</p> <p>Tankers associated with the Westridge Marine Terminal/Kinder Morgan pipeline expansion project could impact marine vessel traffic for xylene tankers associated with the project near the western portion of the Strait of Juan de Fuca at a point in the Strait of Juan de Fuca that is between the mouth of the Lower Elwha River and Port Angeles and westward (see Table 1-2 in Section 1.7.2.2 of the Draft EIS).</p>

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		on top of the existing traffic from the two regions.	<p>Controls that would be in place to prevent or minimize impacts are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding adverse weather conditions is provided in Section 3.9.2.3 of this Final EIS. Several test simulations of spill releases under high wind speed conditions were examined during the development of the Draft EIS. These simulations showed that adverse conditions greatly reduced the impact from the spills due to the close proximity of shorelines at the dock and throughout the ship channel in the Salish Sea.</p> <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic is provided in Section 3.9 of this Final EIS.</p>
Ch13-460	Bob Zeigler	Please include University of Arizona's Climate Alliance Mapping Project video on impact of world shipping on Climate with data from 2012 that has increased in last five years to assess if an increase of 60 large ships a year of export would be truly insignificant. Link to that video is: https://www.shipmap.org/	The proposed project's emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS. Additional information regarding the proposed project's GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS.
Ch13-461	Court Olson	To avoid destruction of the Salish Sea ecosystems and critical habitat for endangered species, we need to lessen tanker vessel traffic, not increase it as Tesoro proposes with this expansion.	Thank you for your comment.

ID	Contact	Comment Text	Response
Ch13-462	Margaret Kinsella	<p>I object to the project for several reasons:</p> <p>...</p> <p>-The increase in vessel traffic impacts the necessary ferry transportation so many residents rely upon.</p>	<p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic, including potential impacts to the ferry system, is provided in Section 3.9.1 of this Final EIS.</p>
Ch13-463	Bob Zeigler	<p>Your document states that the project would cause an increase in large marine vessel traffic of 2.2% and therefore impact on marine life would be minimal. However, when there are currently serious vessel impacts on marine life an increase of event% can be significant.</p>	<p>The Draft EIS analyzed potential impacts according to the general methodology provided in Section 1.7 of the Draft EIS, including an evaluation of the potential impacts' magnitude, geographic extent, and duration. Each potential impact was carefully analyzed according to the resource-specific criteria provided in Appendix 1-B of the Draft EIS and the analysis of impacts in each of the resource chapters. The analysis provides information on exactly why an impact was rated as <i>potentially significant</i> or <i>less than significant</i>.</p> <p>The Draft EIS discusses potential impacts on marine life in Section 7.4. Additional information regarding potential impacts on marine life from increased vessel traffic is provided in Section 3.5 of this Final EIS.</p>
Ch13-464	Glen Hendrick	<p>We don't need to be, we're already fighting other tanker traffic in the area we don't need to be introducing more tankers into this area.</p>	<p>Thank you for your comment.</p>
Ch13-465	Mary Carol Britt	<p>Increasing traffic carrying toxic materials is a recipe for disaster and should not be allowed in the sensitive waters of the Salish Sea.</p>	<p>Thank you for your comment.</p>
Ch13-466	Joline Betterndorf	<p>Additional marine traffic, including articulated tug barges, will add to the existing traffic in the narrow and problematical straits going to and from the refinery. Five more marine vessels per month are currently estimated will travel the waters. This i also should be considered an accumulation effect on marine traffic and marine</p>	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions, including the Kinder Morgan project, in Section 13.6.</p>

ID	Contact	Comment Text	Response
		<p>life.</p> <p>Tesoro has also not considered how Canada's planned expansion of rail and ship traffic of petroleum to be shipped through the Salish Sea will impact the increasingly busy and potentially dangerous shipping lanes between Washington State, adjacent islands, and British Columbia. We have no control over Canada's traffic or environmental laws. Vancouver Island's continued raw sewage pollution of the Sound does not give much confidence about the province's concern for the strait's health.</p>	<p>Tankers associated with the Westridge Marine Terminal/Kinder Morgan pipeline expansion project could impact marine vessel traffic for xylene tankers associated with the project near the western portion of the Strait of Juan de Fuca at a point in the Strait of Juan de Fuca that is between the mouth of the Lower Elwha River and Port Angeles and westward (see Section Table 1-2 in Section 1.7.2.2 of the Draft EIS).</p> <p>Controls that would be in place to prevent or minimize impacts are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Marine vessel safety and waterway management are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels traveling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel traffic is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel traffic is provided in Section 3.9 of this Final EIS.</p>
Ch13-467	Sanford Olson	<p>My concerns about the Project include the following:</p> <ol style="list-style-type: none"> 1. The additional 120 annual tanker transits which will increase the risk of xylene, reformate, and propulsion fuel spills from Project associated vessels. This Project's tank vessel increase, considered in isolation, may seem negligible, but added to all the existing and proposed shipping from US and Canadian ports transiting the narrow waterways around San Juan County the contribution to the cumulative impact becomes significant. 	<p>The Draft EIS considers future potential impacts in the cumulative impacts analyses in each resource chapter (Chapters 3 through 13). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals). Reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS. Cumulative impacts for marine transportation are discussed in Section 13.6 of</p>

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			<p>the Draft EIS.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-468	Sanford Olson	<p>If the project is approved, require all project related laden tank vessels (regardless of size/DWT) to be escorted by tug(s) of sufficient power and maneuverability to assure safe transit through the Salish Sea east of Port Angeles.</p> <p>If the project is approved require all project related ATBs and other seagoing barges to be under the direction of a state-licensed Puget Sound Pilot. Puget Sound Pilots are most familiar with the unique characteristics and challenges of the US portion of the Salish Sea.</p>	<p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1

ID	Contact	Comment Text	Response
			<ul style="list-style-type: none"> • Pilot and tug escort requirements – Section 13.4.1.2 <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the U.S.C.G, Ecology, and U.S.EPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-469	Sanford Olson	<p>If the Project is approved, require that no bunkering be allowed for Project related vessels while at anchor and require all Project related bunkering activity to take place only at the Tesoro dock and only with pre-booming, with no exceptions. At the very least, the risk mitigation measures in the VTRA 2015 should be addressed in the FEIS. These include tug escort requirements and additional Emergency Response Towing Vessel(s).</p>	<p>Bunkering activities are described in Sections 13.1 and 13.3.1.4 of the Draft EIS. Bunkering activities must comply with applicable provisions of federal and state regulations (WAC 317-40). Placing boom around vessels docked at the wharf during transfer operations is now required, and is a preventive measure to contain oil in the event of an incident while loading or unloading oil. Pre-booming around a vessel while loading or unloading light-end hydrocarbons such as xylene and reformates can create a safety hazard primarily associated with fire, and is not a viable mitigation measure.</p> <p>Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology’s Office of Marine Safety. Additional information regarding the agencies responsible for regulating bunkering activity and marine transportation is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The mitigation measures included in Chapter 4 of this Final EIS are generally consistent with the VTRA risk mitigation measures. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, anchorage and bunkering, and spill response is provided in Sections 3.8 and 3.9 of this Final EIS.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with USCG regulations (46 CFR 15.812)</p>

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			<p>and the Washington State Pilotage Act (RCW 88.16.180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformat would require tug escorts in accordance with the Pilotage Act (RCW 88.16.190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformat transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using Puget Sound licensed pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>An emergency response towing vessel (the “rescue tug”) is stationed in Neah Bay, staffed continuously, and available 24 hours a day, 7 days a week. In addition, both the refinery and the independent marine vessels contract with oil spill response contractors who could respond to an emergency towing situation.</p>
Ch13-470	Sanford Olson	Require the FEIS to address additional mitigation measures to reduce the risk of a vessel casualty in the increasingly complex marine transportation environment evolving in the Salish Sea.	<p>The USCG’s Puget Sound VTS maintains positive control of incoming and outgoing tankships, much like air traffic control (see Section 13.3.1.1 of the Draft EIS). In addition to the VTS, Section 13.4.1.2 of the Draft EIS discusses the policies, procedures, and organizations that manage safety and operations in the waterways within the study area, including tanker prohibitions, pilot and escort tug requirements, traffic separation, rescue tug,</p>

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			<p>safety zones, security zones, and other requirements. Marine vessel transportation and safety in Puget Sound is administered by the USCG and Ecology’s Office of Marine Safety.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine transportation, and spill prevention and response is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-471	Tom Strawman	<p>When I hike to high places above the Salish Sea (Blanchard Mountain, Mt. Erie, Guemes Mountain, etc., I see multiple tankers stacked up waiting to be accommodated by Tesoro or Shell. This seems to be an accident waiting to happen. We should not increase this risk by adding more and more ship traffic to this sensitive habitat. This is not some remote Alaskan bay, but instead a densely populated coastline.</p>	<p>Thank you for your comment.</p>
Ch13-472	Linda Gillaspy	<p>Tesora wants to add 120 more barges and tankers per year which will contain the petrochemical Xylene. This is an obvious danger to the Salish Sea, our salmon and our orcas.</p>	<p>The Draft EIS discusses the potential impacts of the increase in vessels on vessel traffic as a result of the proposed project in Section 13.3. Potential impacts from increased marine vessel traffic on marine wildlife, including Southern Resident killer whales and salmon, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Southern Resident killer whales, salmon, and other marine resources – Section 7.4 <p>Vessel safety and waterway management are discussed in Section 13.4.1.2 of the Draft EIS.</p> <p>Requirements for the safe marine transportation of mixed xylenes are administered by the USCG and Ecology. The USCG</p>

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			<p>VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding marine transportation and the potential impacts on Southern Resident killer whales is provided in Sections 3.5.1 and 3.9 of this Final EIS.</p>
Ch13-473	Kerry Koski	I'm concerned about the EIS statement not being complete and increased shipping and concerns with delays to Marine traffic in the area, all calling for things that I don't think warrant the project going through.	Thank you for your comment.
Ch13-474	Sandy Rabinowitz	There should be strict limitations on the train/cargo ship traffic associated with the production of xylene, if it proceeds at all. It is often in the transport of these materials that the worst disasters occur.	<p>The proposed project does not include transport of crude oil by rail. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and the USEPA. Additional information regarding the agencies responsible for regulating the marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p>
Ch13-475	Rene Vance	Regarding marine traffic impacts of CPUP, the 5 additional vessels per month figure is a relatively small increase. The number of ships and barges at the Tesoro wharf has actually decreased by more than 5 vessels per month over the past 10 years. While crude-by-rail has received a lot of negative attention, much of it justified after terrible incidents, the use of trains has decreased the need for crude to arrive via ships, and the lighter crude oil types have	Thank you for your comment.

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		yielded more consumer transportation fuels and less heavy industrial fuels that exit Tesoro via barges.	
Ch13-476	Amanda Sue Rudisill	We the people do not want the Pacific Northwest to become a major highway for oil tankers. Tesoro wants to add 120 more barges and tankers per year of full of toxic petrochemicals through the already crowded and narrow passages of the Salish Sea—threatening the endangered salmon and southern resident orcas.	Thank you for your comment.
Ch13-477	Renee DeMartin	Just adding 120 more barges and tankers to this delicate area that supports orcas should make it a non starter.	Thank you for your comment.
Ch13-478	Martha Koester	We do NOT need the Puget Sound to become a superhighway for oil tankers.	Thank you for your comment.
Ch13-479	Randall Potts	It's obvious that we don't need more toxic shipping--it's too dangerous, too expensive to remediate damage, and a dead end industry that will only cause harm to our local and global environment.	Thank you for your comment.
Ch13-480	Vicki Thomas	Per the draft EIS, there will be increase of 60 tankers per year through the sensitive marine habitat of the Salish Sea and San Juan Islands. More traffic means increased risk of spills.	Thank you for your comment.
Ch13-481	Alec McDougall, Sandy McDougall	The increase in traffic the xylene production would produce is a caution, also. We don't need to greatly increase traffic in already busy waters.	Thank you for your comment.
Ch13-482	Leslie Sharpe	The expansion project... as well as increasing tanker traffic through sensitive marine habitat.	Thank you for your comment.
Ch13-483	Liisa Wale	This expansion to produce 15,000 barrels of xylene per day for export to Asia would bring an additional five tankers per month through the Salish Sea. Each additional tanker or barge in the Salish Sea compounds the already crowded shipping traffic and	Thank you for your comment.

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		<p>increases the risk of spills of crude oil and other refined products.</p> <p>I personally am very concerned about the impacts to the community and water ways that increased tanker traffic and rail traffic will have.</p>	
Ch13-484	Lael White	The draft EIS falls short on key measures including...risks to marine habitat associated with increase of tanker traffic through the San Juan Straits and the Salish Sea	Thank you for your comment.
Ch13-485	David Chapin	I am very concerned about the potential impacts of the Tesoro Anacortes Clean Products Upgrade Project. This project poses real threats to the Salish Sea due to increased tanker traffic carrying a very toxic cargo.	Thank you for your comment.
Ch13-486	Gunnel Clark	The Draft Environmental Impact Statement (EIS) mentions the increased tanker traffic in the Salish Sea, adding 5 tanker per month. This on top of the 34 additional tankers per month proposed as part of the Kinder Morgan Trans Mountain Pipeline expansion. leaves out many problems that might arise.	Thank you for your comment.
Ch13-487	Caroline Armon	This project will require 120 additional annual tank vessel transits through the Salish Sea.	Thank you for your comment.
Ch13-488	Lael Bradshaw	This is a bad idea to have more tankers coming in.	Thank you for your comment.
Ch13-489	Jillian Saxty	My family lives in this area and these waters need your protection. Please stop crowding the waters with ships filled with dangerous toxic chemicals.	Thank you for your comment.
Ch13-490	Sadie Sullivan-Greiner	I am deeply concerned about the proposed increase in petrochemical sea traffic.	<p>The Draft EIS discusses the potential impact on marine vessel traffic from the increase in marine vessels as a result of the proposed project in Section 13.3. The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in Chapters 4, 6, 7, 9, 10, 11, 12, and 13 of the Draft EIS.</p> <p>Vessel safety and waterway management are discussed in Section</p>

ID	Contact	Comment Text	Response
			<p>13.4.1.2 of the Draft EIS.</p> <p>Requirements for the safe marine transportation of mixed xylenes are administered by the USCG and Ecology's Office of Marine Safety. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding marine transportation is provided in Section 3.9 of this Final EIS.</p>
Ch13-491	Joan Robins	EXPANDING BARGE AND TANKER TRIPS BY 120 MORE TRIPS A DAY GREATLY INCREASES THE DANGERS TO ENDANGERED SALMON AND ORCAS. THESE VESSELS ARE CARRYING TOXIC PETROCHEMICALS THROUGH THE VERY NARROW AND CROWDED PASSAGES OF THE SALISH SEA. A FULL REVIEW IS NEEDED.	The vessel traffic expansion is 120 more transits per year, 60 additional vessels per year.
Ch13-492	Debra Polansky	I support limiting tanker access!	Thank you for your comment.
Ch13-493	Ella Craig	We do not want our Pacific Northwest endangered by more tankers full of toxic petrochemicals!	Thank you for your comment.
Ch13-494	Marian Cooley	I feel it would be too easy to have an accident in the crowded and narrow passages and this is no place we want to take a chance on polluting. There should certainly be a full review of the impacts of this proposed expansion.	<p>The Draft EIS discusses the potential impact on marine vessel traffic from the increase in marine vessels as a result of the proposed project in Section 13.3.</p> <p>The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality – Sections 4.4.3 and 4.4.4 • Marine birds – Section 6.4.2 and 6.4.3 • Special status terrestrial species – Section 6.5 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3

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			<ul style="list-style-type: none"> • Human health – Sections 9.3.2, 9.5.2, and 9.6.2 • Land and shoreline use, recreation, and visual resources – Sections 10.3.2, 10.4.2, and 10.5.2 • Public services – Section 11.4.2.4 • Treaty and traditionally used resources – Section 11.5.2.3 • Economics/employment income and tax receipts – Sections 11.5.2.4 and 11.6.2.2 • Minority and low-income populations – Section 11.7.2 • Cultural resources – Section 12.4.2 • Vessel traffic , vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>Requirements for the safe marine transportation of mixed xylenes are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding marine transportation is provided in Section 3.9 of this Final EIS.</p>
Ch13-495	Andrew St Laurent	I oppose the expansion of the amount of vessels allowed the crowded & narrow passages of the Salish Sea. Not only would it increase the danger to wildlife it would also in create the risk of shipping accidents.	Thank you for your comment.
Ch13-496	Corinne Salcedo	I'm concerned about 120 additional trips per year by barges and tankers carrying petrochemical through the Salish Sea.	<p>The Draft EIS discusses the potential impact on marine vessel traffic from the increase in marine vessels as a result of the proposed project in Section 13.3. The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in Chapters 4, 6, 7, 9, 10, 11, 12, and 13 of the Draft EIS.</p> <p>Vessel safety and waterway management are discussed in Section 13.4.1.2 of the Draft EIS.</p>

ID	Contact	Comment Text	Response
			<p>Requirements for the safe marine transportation of mixed xylenes are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding marine transportation is provided in Section 3.9 of this Final EIS.</p>
Ch13-497	Corinne Salcedo	The passages are narrow and crowded, and that creates too much risk of toxic spills, which would harm marine life, including salmon	Thank you for your comment.
Ch13-498	Sue O'Donnell	Tesoro wants to expand into a new venture to handle the very dangerous chemicals which result from reducing the sulfur content of gasoline. NO!! This will mean more construction in the fragile part of the Salish sea between Fidalgo & Padilla Bays. This area is already suffering from loss of habitat and the pollution caused from the many tankers coming & going through the narrow passages of the San Juan Islands. AND part of the Tesoro plan to ship very dangerous chemicals will require an increased number of ships.	Thank you for your comment.
Ch13-499	Bonnie Lehecka, William Lehecka	We live on Samish bay, we have witnessed a large increase of commercial vessel's in our waters. I am very concerned with the lack of studies and the increased future amount of boats that The refinery is proposing. Right now I look out in the Bay and see if five boats anchored. They are very powerful lights and make a lot of noise that keep us awake at night. If there ever was a problem with any kind of contamination it's going to ruin our beaches and send our property values plummeting. Please we would like to have no increase traffic and the traffic that's out there to stay further away from the beach.	Thank you for your comment.

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Ch13-500	Rachael Black	I know how fragile the Sound is and Hood Canal and the Islands. We need safer vessel and high standards for their operation on our shores.	Thank you for your comment.
Ch13-501	Teresa Dowling	I do not support Tesoro refinery ADDING 120 vessels trips per year carrying petrochemicals! These waterways are already crowded and inhabited by endangered wild salmon and southern Orcas. Not to mention the surrounding population of people who enjoy these waters for recreation and for fishing, crabbing, etc.	<p>The Draft EIS discusses the potential impacts of the increase in vessels on vessel traffic as a result of the proposed project in Section 13.3. Potential impacts from increased marine vessel traffic on marine wildlife, including Southern Resident killer whales and salmon, are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Southern Resident killer whales, salmon, and other marine resources – Section 7.4 • Human health – Sections 9.3.2, 9.5.2, 9.6.2 • Land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2 • Aesthetics and views – Section 10.5.2 • Vessel safety and waterway management are discussed in Section 13.4.1.2 of the Draft EIS. <p>Requirements for the safe marine transportation of mixed xylenes are administered by the USCG and Ecology. The USCG VTS determines the appropriate course and speed of vessels travelling through the study area to maintain positive control of incoming and outgoing tankships and maintain safe distances from other vessels and navigational hazards.</p> <p>Additional information regarding the agencies responsible for regulating marine vessel transportation is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding marine transportation and the potential impacts on Southern Resident killer whales is provided in Sections 3.5.1 and 3.9 of this Final EIS.</p>
Ch13-502	Beverly Faxon	Increased vessel traffic associated with xylene’s production and	Thank you for your comment.

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		export, ...[is] also of concern.	

Other

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Other-0001	Rebecca Canright	Additionally, the transport of the base material used to make the xylene will increase rail traffic. This means a greater risk for railroad accidents, which would be incredibly damaging and dangerous given the toxic nature of the base material.	The proposed project includes the transport of xylenes and reformate using tankships and tank barges (see Section 2.8.2 and Chapter 13 of the Draft EIS). The proposed project would not increase transport of materials by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the transport of materials to the Tesoro Refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0002	Peggy Printz	I would require absolute assurance that no components of this project will ...lead to an increase in oil trains beyond current levels is required.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0003	Polly Freeman	No part of this project can ... add to oil trains already dangerously running through our neighborhoods.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0004	Gayle Janzen	We need 100% assurance that NO components of this project ...lead to an increase in oil trains beyond current levels.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0005	Rebecca Canright	I am concerned that the xylene plant will increase rail traffic (given the need to transport the base product used to make the xylene).	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not

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			analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0006	Mary Sinker	The Anacortes refinery currently receives 4-5 crude oil trains per week and these explosive trains have potential lethal consequences for the local communities they travel through. The Final EIS must contain specific provisions that prevent Tesoro from increasing the number of crude oil trains received at the refinery.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0007	Edward John McLeod	The rail ... that are necessary to transport the crude to, and the finished product from the refineries have a long history of catastrophic failures.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0008	Dennis Parent	I don't want the added oil trains needed to produce this poison.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0009	Phyllis Dolph	The draft EIS does not adequately examine the impact of the crude oil trains which come to the Tesoro refinery every week. There are many aspects of concern: impeding vehicle traffic, like people getting to work or school, impeding the police, ambulance, or people going to the hospital emergency entrance.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0010	Phyllis Dolph	These mile-and-a half long trains run through communities...even through Seattle along side of the stadium. Since2013, the number of train derailments has continued to rise. We in Anacortes, Burlington, and along the tracks, fear that some day, many thousands of gallons of crude could spill, explode, and major fires would result. The DEIS does not require assurance that there will be no increase in crude oil trains in the future. Hello ! We do not	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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		want these trains here.	
Other-0011	Phyllis Dolph	This expansion will mean ... the continued threat of explosive oil trains running through our communities.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0012	Melinda Mueller	what will be the impact on crude oil-bearing train traffic? Will additional traffic be permitted under this plan? What will be the impact on communities through which this explosive cargo passes? What are the requirements for ADDITIONAL permitting and EIS statements if Tesoro increases the volume of crude oil being transported to the facility?	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0013	Steve Knutsen	Trainloads of volatile shale oil pulled here by diesel trains, refined into VERY volatile xylene and other toxic compounds, stored in a vast tank farm just above water's edge, then piped into foreign ships , all burning bunker oil(like coal, but semi-liquid). is darned scary to me. There were 715 oil pipeline spills in the U.S. in 2015. Train derailments happen almost monthly.	Thank you for your comment.
Other-0014	Libby Hazen	As a mother and grandmother living in close proximity to the railroad tracks, I am very concerned about the Tesoro Anacortes Upgrade Project! I already fear the treats to my family's health (and possibly life) from the explosives being shipped.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0015	Libby Hazen	The addition of Xylene would greatly increase train traffic	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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Other-0016	Wendy Courtemanche	I am also concerned that this project not lead to increased crude oil train traffic in our region nor to the exporting of crude oil from this facility. I ask that Skagit County include language in the final EIS that would prohibit increased crude oil train traffic to the refinery in relation to the xylene project,	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0017	Libby Mills	I do not support an increase in dangerous oil trains passing through our small and poor communities, endangering life and property every mile they cross.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0018	Jennifer Beetem	The draft EIS also fails to...evaluate the risks increased explosive oil train traffic on its way to Anacortes presents to the many railroad communities of northwest Washington. In Seattle where I live, oil trains, freight, regional trains and Amtrak run daily through a 1905 tunnel and we are lucky the only oil train derailment in town so far was north of the tunnel. If a new petrochemical processing facility is built in Anacortes, more explosive petrochemical trains will come, and disaster response plans for oil train derailments, spills or explosions in the diverse urban and rural environments through which these trains pass are inadequate.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0019	Jan Gordon	Is there a a limit on the number of dangerous oil trains coming to the refinery? they already exceed the limit agreed witht Swinomish and the trains were considered dangerous enough to get Shell to pull their permit for oil by rail.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0020	Martha Hall	9. The impacts of oil trains bring crude to Anacortes needs to be studied and analyzed. This has never been adequately done. We now know how dangerous these trains are in their entire route through our state, along our rivers, beside the Salish Sea, through our communities. The xylene project would make these shipments	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits

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		more likely to continue and they could increase.	issued for the proposed project.
Other-0021	Edward John McLeod	<p>The rail and marine tankers that are necessary to transport the crude to, and the finished product from the refineries have a long history of catastrophic failures.</p> <p>As a resident of San Juan County and Planet Earth, I would like to strongly oppose an additional risky and unnecessary refining / manufacturing site which will attract an equally risky and unnecessary influx of smog producing transportation traffic and the inherent potential for disastrous accidents and / or spills.</p>	The proposed project includes the addition and upgrade of infrastructure at the existing Tesoro Anacortes refinery.
Other-0022	Ruth LeBrun	BOTTOM LINE: We do NOT need increased ... train traffic carrying toxic substances that risk the fragile air, water and land habitats of Fidalgo Island and Skagit County.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0023	Ronald Nichols	the danger of DOT-111 tank cars has not been addressed in any meaningful way, a derailment event is a real danger!	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0024	Ronald Nichols	marine and truck traffic of hazardous materials will increase and rail traffic may also do the same.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. Benzene, toluene, hexane, hydrogen sulfide, polycyclic aromatic hydrocarbons, and xylene would not be transported over the Skagit River for the proposed project. Commodity chemicals including sulfolane, aqueous ammonia, and perchloroethylene would be delivered by truck, possibly over the Skagit River, as part of the proposed project. Potential impacts from increased truck traffic to deliver these

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			chemicals are discussed in Section 9.4.2.2 of the Draft EIS. Based on expected usage rates and typical truck capacity, the proposed project would generate approximately 50 truck trips per year. Impacts associated with an accidental spill of materials transported via truck, such as a spill along SR 520 bridge over the Skagit River, are discussed in Section 9.6 of the Draft EIS.
Other-0025	Veronica Nelson	Already we have to deal with the risk of the trains exploding let alone the inconvenience of them blocking the tracks preventing citizens from going about their business. The trains are much longer than allowed.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0026	Joanna Schoettler	If you really want to look at it, go look at what's happening at the Arctic. But let's just also look at here, with the crude oil as well as the -- the gas -- the bomb trains that will be coming to bring this stuff in. You know, the BNSF and the railroads, they have very -- lots and lots of violations -- 400 this year, 400 violations. And anything could -- however those trains come through -- anywhere along the way from the Bakken crude -- and we can go -- what's happening with the Bakken crude -- we have standing rock.	Thank you for your comment.
Other-0027	Robert Gerfy	I am especially concerned about: ... 2. Increased oil trains through Skagit County, especially on flimsy bridges like the one over the Swinomish Channel.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0028	Valerie Rose	The EIS must include: ... 4) No option for increasing crude oil shipments by rail to Tesoro, to provide raw materials for making xylene.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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Other-0029	Carlo Voli	please make sure there's no chance of an increase in oil train traffic.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0030	Anne Winkes	Tesoro's proposed xylene project specifies that some of the Bakken crude needed for xylene production will be transported to the refinery and the unit oil trains that travel these tracks. The Draft EIS does not consider the adverse impact of these trains on the health and safety of the communities which the trains pass, as Skagit County permitted the use of these trains in 2011 without requiring an EIS. In 2013, the danger of transporting Bakken crude by rail was made tragically apparent when 47 people were killed following a fiery derailment of a train. More explosive derailments followed. In 2015, Skagit County required Shell do an EIS before permitting a proposed unloading facility for crude oil transported by rail. Shell withdrew the permit application before the EIS was completed. So, Skagit County has not yet reviewed the impacts of unit oil trains on the health and safety of communities along the rail route from the Midwest to March Point. The Bakken crude carrying oil trains pose health-altering and life-endangering threats to people near the tracks. The EIS must consider all the direct, indirect, and cumulative adverse health and safety impacts of those trains carrying Bakken crude along their route, including the catastrophic oil train derailment. These are not mitigable impacts. Skagit County must neither repeat nor compound its 2011 error of omission. The EIS must permit this project only if there's a binding [unintelligible] oil train traffic to and from Tesoro, and only if it is consistent with the outcome of the litigation between the Swinomish Tribe and BNSF concerning the limit on train cars crossing reservation land.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0031	Joanne Schoettler	these crude oil trains are very, very heavy on these tracks. And they're splitting the tracks, which means that they're losing -- they're having violations after violations, which at some point -- we've already had Mosier in the past two years, where that train	Thank you for your comment.

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		blew up. And you'll have to remember about the Quebec City that blew up, and 47 people died in the middle of town because of that crude oil train. Think of how many crude oil trains come here. And what about the one that goes under the City of Seattle every time one comes up? That's a two-mile train. Any time, that could blow up. So, it's not just about the community. It's all the way along the tracks.	
Other-0032	David Henry	The does this plan account for the numerous rail explosions of Bakken crude and tanker accidents. Tesoro or any refinery should not be allowed to increase crude production import or export crude oil or byproducts without proper additional permits and independent environmental impact assessments.	The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0033	Sigrid Asmus	I am a Seattle resident living in BNSF's Blast Zone, already subject to the risk oil trains present to my area, and that an increase in oil shipments would represent.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0034	Sigrid Asmus	The increased production of xylene for shipment to Asia to be used for manufacturing plastic would also increase the number of oil trains passing through Washington State, in the tunnel beneath the City of Seattle, near my home, and near the homes of hundreds of communities and many thousands of people in a heavily populated area where any spill or explosion could create massive damage.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0035	Millie Magner	And, it would mean a possible pathway for the refinery to increase oil train traffic and start shipping crude oil.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits

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			issued for the proposed project.
Other-0036	Mark Meeks	Please take care that whatever action is taken that it does not lead to increased use of oil trains.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0037	[Name not provided]	I believe that the impact on the community in the environment is significant. There is...the continued threat of explosive oil trains traveling through our communities, including next to where I work where which is with with children and families. We already have a significant number of trains that go by each day and it impacts traffic it impacts health. The particulates from this train with children and families that live by the tracks is already impacted so I'm urging that this project not go through.	Thank you for your comment.
Other-0038	Robyn Hallonquist	I would like the EIS to address the environmental impacts of ...transporting crude by rail,	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0039	Phyllis Dolph	<ul style="list-style-type: none"> • [Image of oil trains] <p>Invalid assurances the project won't increase crude oil train traffic: The Tesoro Anacortes refinery currently receives 4-5 crude oil trains per week. But the draft EIS doesn't examine the impact of these explosive trains traveling through our communities, and it doesn't require assurances that no increase in crude oil trains will be permitted in the future. In fact, there will be more trains in the future. Already, trains impede traffic for hours, stopping people from going to the hospital, the police and ambulances getting across railroad crossings. What is more: the likelihood of spills increases as train numbers increase. The refinery should have money and well rehearsed plans for what to do when and if there</p>	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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		<p>is a spill or an explosion. A 1997 Ecology study assessing the residual impacts of a 1991 crude oil spill from the former Texaco (now Tesoro) refinery found elevated concentrations of PAHs “two to four times higher in Fidalgo Bay than in the reference areas.” Authors note, “The sediment and water quality of Fidalgo Bay are continually threatened by potential oil spills from the two refineries.</p> <p>What would happen if a spill happened which polluted our drinking water? If more than 100-car trains travel daily over the Skagit River (one loaded train, and one empty train for each refinery). The rail crossing over the Skagit River is about 3.5 miles upstream from the Anacortes Water Treatment Plant, which serves 56,000 residential, commercial and industrial customers. It is the only supply of potable water for: (1) the residents of Anacortes, La Conner, and Oak Harbor, (2) a wide variety of commercial and industrial customers (including the refineries), and (3) the Whidbey Naval Air Base. In case of an earthquake or other cause of a spill, the operators of our regional water system would have no time to avert a disaster should an oil spill occur on the Skagit River rail crossing.</p>	
Other-0040	Xochi Rose	<p>Moreover, I have found no conclusive information regarding increased rail traffic, or the frighteningly unsafe possibility of trucking Bakken Formation Crude and other explosive noxious materials through our collective backyards.</p>	<p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0041	Galen Herz	<p>I also would like to see assurances that the project won't increased the amount of crude oil going through our communities by rail.</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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Other-0042	Ronna Loerch	3. There is the potential for increased transport of crude oil to allow for this processing for Xylene and this has not been addressed in the Draft EIS.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0043	Helen Moran	<p>What's missing from the draft EIS: ...</p> <p>Assurances the project won't increase crude oil train traffic: The Tesoro Anacortes refinery currently receives 4-5 crude oil trains per week. But the draft EIS doesn't examine the impact of these explosive trains traveling through our communities, and it doesn't require assurances that no increase in crude oil trains will be permitted in the future.</p>	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0044	Phyllis Dolph	<p>Skagit County should include language in the final EIS that:</p> <p>...</p> <ul style="list-style-type: none"> • Prevents Tesoso from increasing crude oil train traffic to the refinery to provide the products needed to create xylene. 	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0045	Deborah Rudnick	In particular, the EIS needs to include: -Assurances the project won't increase crude oil train traffic: The Tesoro Anacortes refinery currently receives 4-5 crude oil trains per week. But the draft EIS doesn't examine the impact of these explosive trains traveling through our communities, and it doesn't require assurances that no increase in crude oil trains will be permitted in the future.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0046	Mary Manous	We should consider all impacts from the proposed plant from increased crude oil transport through Washington State and beyond, on sight in the Anacortes area, and during production and transport out to Asia for plastics production.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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Other-0047	Jeffrey Jacobs	<p>The EIS directed by the county should require assurances that the number of crude oil trains or other trains carrying potentially explosive or hazardous materials NOT INCREASE if Tesoro expands its operation to produce mixed xylene at the Anacortes.</p> <p>The 4-5 crude oil trains per week that currently travel through populous neighborhoods making deliveries to Tesoro already pose a threat in the event of a derailment or other mishap. More crude oil deliveries will only increase the risk to the public.</p> <p>Include in the EIS a stipulatory clause that will prohibit Tesoro from increasing the number of oil train deliveries in the future.</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0048	Deborah Rudnick	<p>The draft EIS is lacking critical information that would enable an accurate and realistic evaluation of the safety and risks of this proposal. In particular, the EIS needs to include: ...-a commitment to not increasing train traffic in order to procure the materials needed for xylene production.</p>	<p>The proposed project would not include transport of reformat or other materials by rail. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of materials to the Tesoro Refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0049	Crystal McCown	<p>Bakken shale oil is highly explosive. There have already been a number of rail accidents just getting the dangerous oil to the Pacific Northwest. Even the new and supposedly improved rail cars have exploded.</p>	<p>Thank you for your comment.</p>
Other-0050	Irene Svete	<p>My second concern is the project's impact on crude oil train traffic through urban areas. The Tesoro Anacortes refinery currently receives 4-5 crude oil trains per week. I urge Skagit County to examine the impact of these explosive trains traveling through our communities, and require assurances that no increase in crude oil trains will be permitted in the future.</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0051	CG Wyatt	<p>5. The Tesoro Anacortes refinery currently receives 4-5 crude oil trains per week. But the draft EIS doesn't examine the impact of these explosive trains traveling through our communities, and it doesn't require assurances that no increase in crude oil trains will be permitted in the future.</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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Other-0052	Mary Ratermann	We do not need, nor require increased train traffic, which brings Bakken crude to Tesoro, through our communities. We have had to wait countless hours, or find detours around train crossings, and this condition will only worsen with further increases of train traffic.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0053	Carl Ullman	7. Prevent increases in crude oil train traffic. The Tesoro Anacortes refinery currently receives 4-5 crude oil trains per week. The DEIS does not examine the impact of a potential increase in the number of these trains moving through our communities. Consequently, the EIS should specify an explicit prohibition on any increase in oil by rail traffic associated with the proposal. There must be no ambiguity about whether the proposed action will increase rail traffic.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0054	Amy Mower	The Final EIS must include an analysis of the impact of these trains [4-5 crude oil trains per week that the Tesoro Anacortes refinery currently receives] traveling through our communities, and the Final EIS must prohibit any future increase in the number of crude oil and other fossil fuel trains.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0055	Amy Mower	The Final EIS must provide absolute assurance that a) no components of this project will be used to facilitate crude or other fossil fuel export, nor b) will this project lead to an increase in oil or other fossil fuel trains beyond current levels.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0056	Skagit Audubon Society, Timothy Manns	9. The potential for increased rail traffic carrying crude oil or reformat is not addressed. In reviewing the draft EIS, we found no reference to the potential of the CPUP to increase the volume of rail traffic to the Tesoro Refinery. During scoping for this draft EIS, we submitted the following comment, which seems to not have been addressed. “There is no assurance, given past history or the present project	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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		<p>information, that the CPUP will not drive an increase in rail traffic to the Tesoro Anacortes facility.</p> <ul style="list-style-type: none"> • What are the 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? • If the Tesoro/Savage oil export terminal proposed in Vancouver is further delayed or fails to receive necessary permits, will Tesoro begin exporting Bakken or other crudes from its Anacortes facility? • If so, what are the potential impacts on bays, rivers, streams, and aquifers located along major rail routes from limited or catastrophic oil spills or explosions from the crude oil's point of origin to March Point? • What are the potential impacts on the Skagit River, Padilla Bay, Fidalgo Bay, and the Salish Sea from limited or catastrophic petroleum (crude oil, xylene, reformate) spills from derailed trains?" <p>We request that the final EIS thoroughly address these concerns.</p>	
Other-0057	Sandy Robson	Prevent Tesoso from increasing crude oil train traffic to the refinery to provide the products needed to create xylene	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0058	Anne Winkes	The permit for the unit oil trains that carry the Baaken crude was granted by Skagit County in 2011 without requiring an EIS. The adverse impacts of the Baaken carrying oil trains on the natural environment of Skagit County has never been never been addressed by Skagit County in an EIS. The final EIS must do so as subsequent to Tesoro receiving its permit in 2011, many derailments and sometime-associated fiery explosions of unit oil trains have occurred, each with significant impacts to the	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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		<p>environment.</p> <p>Tesoro’s oil trains travel close to the shores of Fidalgo Bay Aquatic Reserve and Padilla Bay National Estuarine Research Reserve. Any derailment (with or without an accompanying explosion) into these bays would have a catastrophic impact on their extensive eelgrass beds, the marine life within them, and the Great Blue Heron that feed there. The final EIS must analyze the adverse impacts on Fidalgo and Padilla Bay of an oil spill from the unit oil trains.</p>	
Other-0059	Anne Winkes	<p>Alternative action:</p> <p>...</p> <p>2) No permit issued for Tesoro’s crude unloading facility specifically limited the number of tank cars Tesoro could unload at their facility. As a consequence of this oversight, Tesoro has significantly increased the amount of crude it receives by train since 2011. The draft EIS does not consider the alternative of limiting the number of oil trains travelling to Tesoro, but should. Though limiting the number of trains will not completely eliminate the adverse impacts to the heronries of oil spills, it would minimize the risk of a spill occurring.</p> <p>The final EIS must permit this project only if there is a binding limit on oil train traffic to and from Tesoro, and only if it is consistent with the outcome of the litigation between the Swinomish tribe and BNSF concerning the limit on train cars crossing reservation land.</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0060	Ruth Holder, Phillip Holder	<p>D. Oil Trains and Crude Export</p> <p>We agree with the comment made by Anne Winkes at the public hearing on April 17, 2017 concerning the DEIS’s complete failure to include the direct, indirect, and cumulative adverse health and safety impacts of trains carrying dangerous and volatile Bakken crude along the route from the upper Midwest, including impacts from a catastrophic oil train derailment. We fully incorporate the entirety of this comment by reference. DEIS § 2.8 provides that the mixed xylenes project would also use “other materials and</p>	<p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>feedstocks” already used at the refinery. This would likely include materials and feedstocks brought to the refinery by rail.</p> <p>The EIS for a (now scrapped) proposed project for Shell Puget Sound Refinery in Anacortes to receive Bakken crude oil by train would have included an analysis of the direct, indirect, and cumulative impacts of impacts of these trains (and accidents involving them) on human health, safety, and welfare and the natural environment. Shell, however, withdrew its application during the EIS process. Due to an oversight in regulation that allowed Tesoro’s oil by rail project to receive permits without an EIS having been conducted, Tesoro’s oil trains were never subject to a full environmental review. That mistake must not be compounded by allowing a possible increase of oil trains in the future resulting from this project. A permit, if any, for this project must include a specific and binding limit on the oil train traffic to and from Tesoro’s facility. The FEIS must fully consider the oil train transportations impacts as well as the litigation between the Swinomish Tribe and BNSF concerning the limit on train cars crossing reservation land and inform decision makers and the public whether this impact could be fully mitigated.</p> <p>The FEIS must not allow a permit to pave the way for crude oil export through Tesoro’s facility. In 2015 Congress lifted the ban on US crude oil exports. The Department of Ecology’s 2014 Marine and Rail Oil Transportation Study found (page 8): “If the federal ban on oil exports is lifted on U.S.-produced oil, then crude oil could move through our state to offshore markets. Each added transfer in the delivery chain increases the potential for oil spills.” It is clear from Tesoro’s involvement in the proposed oil train terminal in Vancouver WA that the corporation is interested in shipping crude oil, brought in by train, to other states and countries. As discussed above, both the absence of limits in a recent permit matter on the Bakken crude volume Tesoro can receive at its oil by rail facility plus the increase in the volume of available tar sands “oil” via pipeline from the Kinder Morgan Transmountain Pipeline Expansion project could enable Tesoro’s export of crude oil, either Bakken and/or tar sands.</p> <p>The planned Marine Vapor Emissions Control system (MVEC)</p>	

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		<p>would be used to control hydrocarbon emissions during vessel loading by collecting vapors displaced by materials being loaded. This system can be used in loading crude oil onto vessels as well as loading mixed xylenes. The FEIS must disclose whether the mixed xylenes project could also result in the export of crude oil and recommend a permit condition that expressly limits the use of the MVEC system for crude oil export. Tesoro should have no objection to such a permit condition in the absence of a plan for crude oil export. If the MVEC is to be used for crude oil export or if Tesoro wants to leave that option open, a Shoreline Conditional Use Permit must also be required with permit conditions that prohibit increases in the volume of crude oil by rail moving through Washington State for purposes of export.</p>	
Other-0061	Virginia Wolff	<p>This Project Must Not be allowed to Increase Oil Train Traffic to the Tesoro Anacortes Refinery Some of the reformato Tesoro would be using in producing xylene would come by train. Currently the refinery receives 4-5 unit oil trains a week. The DEIS does not examine the risks of bringing these potentially explosive trains through our community. Tesoro's oil-by-rail project was permitted in 2011 before oil trains started blowing up, hence there was no public awareness of the dangers, and no EIS was required. In their permit application Tesoro proposed to bring in 3 unit trains a week. The permit did not limit the number of trains the refinery could bring in a week. The number they currently receive exceeds what their application stated. Indeed, the Swinomish Tribe is currently in litigation with BNSF regarding violation of their lease agreement with the railroad to limit the rail traffic traveling to the refineries to 25 cars a week. There is no mention in the DEIS that this project depends upon an ongoing violation of the Tribe's lease with the railroad.</p> <p>It is reasonable to be concerned that Tesoro may want to bring more reformato in by rail as well as by sea. The DEIS for Shell's oil-by-rail facility determined these train do carry significant risk impossible to mitigate. It was a regulatory error that allowed the oil-by-rail facilities of other local refineries to be built. Allowing a future increase in the number of these trains as a result of this</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>project would compound this mistake.</p> <p>Permitting this project must be contingent upon a binding limit on the number of oil trains traveling to and from the Tesoro Anacortes Refinery.</p>	
Other-0062	Pilchuck Audubon Society, Allen Gibbs	<p>We note absence of mention of overland transportation of xylene and reformates by truck and rail. Some of the chemicals required in production of xylene will come by rail; not just by marine tankers.</p>	<p>Xylene and reformat feedstock would be shipped to the site via marine vessels. However, other chemicals associated with the proposed project would be shipped via truck, including sulfolane, aqueous ammonia, and perchloroethylene. Based on expected usage rates and typical truck capacity, the proposed project would generate approximately 50 truck trips per year. Section 9.6.2 of the Draft EIS includes an analysis of potential impacts associated with a spill associated with shipment of these materials to the site via truck.</p> <p>The proposed project would not increase transport of materials by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the transport of materials by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0063	Pilchuck Audubon Society, Allen Gibbs	<p>We join with fellow citizens in asking you to do the following:</p> <ol style="list-style-type: none"> 1. Gain assurances from Tesoro it will not increase crude oil train traffic through our communities carrying products needed for xylene production; 	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0064	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands	<p>Our community must have assurances the project won't increase crude oil train traffic</p> <p>The Tesoro Anacortes refinery currently receives crude oil shipments by rail, an estimated 45 unit trains per week. The draft EIS does not examine the impact of these explosive trains traveling through our communities. If reformat feedstock is coming by marine vessel, it is reasonable to foresee that limited dock capacity could influence demand to bring even more oil in by unit train. The</p>	<p>The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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	<p>Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>DEIS did not appear to consider this possibility.</p> <p>The Tesoro Savage Vancouver Energy Distribution Terminal would be the largest oilbyrail facility in North America, proposed to transfer 360,000 bbl daily. This project is widely opposed, with notable opposition from the Cities of Vancouver, Portland, Spokane, Washougal, ILWU Local 4, Columbia Waterfront LLC, the Columbia River Intertribal Fish Commission, dozens of organizations and thousands of individuals calling on Washington State to deny permits. If Tesoro’s oil terminal is rejected, increased crudebyrail traffic to Anacortes (Tesoro’s only other oilbyrail facility in the Northwest) is a foreseeable risk which ought to be addressed in the FEIS.</p> <p>The recent draft EIS for the Shell oil train project nearby found that the impact of these trains would have been both significant and impossible to mitigate. Due to an oversight in regulation, the rail terminal at Anacortes was never subjected to a full environmental review, having been issued an MDNS in 2013. That mistake should not be compounded by allowing a possible increase oil trains in the future that results from this project.</p> <p>Moreover, The Swinomish Indian Tribal Community is in the midst of litigation with BNSF which asserts a 25 train car per day limit on oil trains. The January 2017 summary judgment for Swinomish Indian Tribal Community v. BNSF Railway Company affirmed that BNSF is continuing to violate the terms of their easement on tribal land. It is a major concern that this project, if it necessitates rail shipments to meet operational demands, also depends on an ongoing violation of the easement. To encourage law abidance, permitting this project must be conditional on a binding limit for oil train traffic to and from Tesoro’s facility which neither violates the Swinomish lease agreement nor increases the level of traffic beyond what is currently occurring.</p>	
Other-0065	Evergreen Islands	<p>Tesoro Savage Vancouver Energy Distribution Terminal Facility at the Port of Vancouver</p> <p>The Draft Environmental Impact Statement⁸ for the proposed Tesoro Savage Vancouver Energy Distribution Terminal Facility</p>	Thank you for your comment.

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		<p>(Tesoro Savage DEIS) at the Port of Vancouver describes Tesoro Savage’s Proposed Action to develop a new crude oil distribution facility (the Vancouver Energy Distribution Terminal Facility at the Port of Vancouver as follows:</p> <p>The Applicant is proposing to construct and operate a Facility that would receive an average of 360,000 barrels (bbl) of crude oil per day by rail, temporarily store the oil onsite, and then load the oil onto marine vessels for transport to existing refineries primarily located on the West Coast of the United States (Alaska, Hawaii, California, and Washington). The crude oil would be delivered to the proposed Facility by rail in “unit trains” composed of up to 120 sole-purpose crude oil tank cars. An average of four unit trains would arrive at the proposed Facility each day. Occasionally, a fifth train may arrive within a 24-hour period. A fifth train would begin unloading within that 24-hour period but would not complete unloading until the following 24-hour period. On other days (or subsequent days) only three trains may arrive within certain 24-hour periods, thus equating to an average of four train arrivals per day (Vancouver Energy 2015). Based on these assumptions, the maximum throughput of crude oil at the proposed Facility would be 131,400,000 bbl per year.</p> <p>The receipt of an average of 360,000 bbl of crude oil each day is based on the following assumptions:</p> <ul style="list-style-type: none"> • An average of four unit trains would arrive at and depart from the proposed Facility each day for a total of 2,920 one-way train-trips (1,460 round trips) per year • Each unit train would consist of 120 tank cars • Each tank car could hold up to 750 bbl of crude oil • Each unit train would deliver 90,000 bbl of crude oil • The time required to unload a single unit train would be approximately 12 to 14 hours • Up to three trains could be unloaded at the same time 	
Other-	Evergreen Islands	<ul style="list-style-type: none"> • How many oil trains traverse Skagit County each week? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in

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0066		<ul style="list-style-type: none"> • How many oil trains does the Tesoro refinery receive per week? • Will the number of oil trains per week increase as due to the production of xylene? • If the number of oil trains increase, will Skagit County delay approval of Tesoro's application until the EIS for the Shell Puget Sound Refinery is completed? • Will any of the ingredient components be transported by rail? If so, where would such products be transported from? 	preparing the Draft EIS.
Other-0067	Evergreen Islands	<ul style="list-style-type: none"> • If the project results in an increase in the number of petroleum (crude oil, xylene, etc.) trains traversing Skagit County, will Skagit County postpone the approval of the project until the Shell EIS is completed? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Other-0068	Liz Lovelett	Consider, also, the impacts of any increase in the ground transport of crude and the communities that this effects along the line.	The proposed project would not increase transport of crude oil by rail or ground transport to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail or ground transport were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0069	Anne Winkes	<p>Adverse health impacts on communities secondary to the oil trains delivering the Baaken crude needed for the xylene component of Tesoro's CPUP:</p> <p>My husband and I have lived in Conway 250 feet from the BNSF rail track for 32 years. I first became concerned about the health impacts of living near train tracks when mile long coal trains passed through Conway. Sleeping with our window open, the smell of diesel fumes would enter our bedroom when the atmospheric conditions were right. I wondered about the impact of those diesel fumes on our health. Then mile long oil trains began to pass through Conway, and though they looked black and sinister and their whistles blasting at Conway's two crossings woke me during the night, I wasn't fearful for our lives until the danger of transporting Bakken crude by rail was made tragically apparent in 2013 when 47 people were killed in Lac Megantic, Quebec with</p>	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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		<p>the fiery derailment of an oil train.</p> <p>Tesoro's proposed Xylene project specifies that some of the Bakken crude needed for xylene production will be transported to the refinery in the unit oil trains that travel from the oil fields of the Midwest to the Tesoro Refinery at March Point.</p> <p>The draft EIS for the CPUP does not consider the adverse impact of these oil trains on the health and safety of the communities through which the trains pass, as Skagit County permitted the use of these trains in 2011. An EIS was not required for the permit.</p> <p>Skagit County's decision to not require an EIS in 2011 was perhaps understandable as until the Lac Megantic tragedy in 2013 the catastrophic dangers to communities of transporting the highly flammable and explosive Bakken crude through them were not known. Ignorance of the dangers can no longer be claimed. The Lac Megantic tragedy made headlines and more explosive derailments, though fortunately not deadly, have followed.</p> <p>In 2015 Skagit County required Shell do an EIS before permitting a proposed unloading facility for crude oil transported by rail. Shell withdrew the permit application before the EIS was completed, so Skagit County has yet to review the impacts of unit oil trains on the health and safety of communities along the rail route from the Midwest to March Point. Tesoro' proposed CPUP project provides Skagit County an opportunity to do so.</p> <p>The Bakken crude carrying oil trains pose health altering and life-endangering threats to people near the tracks.</p> <p>The final EIS must consider all the direct, indirect and cumulative adverse health and safety impacts of these trains carrying Bakken crude as they pass through communities in Skagit County and beyond on their way to the Tesoro March Point Refinery.</p> <p>1) Adverse health impacts secondary to the explosive, fiery nature of the Bakken crude carried by the Tesoro oil trains.</p> <p>The blast zone from the Lac Megantic explosion had a 1/2 mile radius. If a derailment and explosion similar to that that occurred in Lac Megantic were to occur near Conway, my home and the</p>	

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		<p>community of Conway, and that section of 1-5 that runs parallel to the tracks just east of Conway, would be destroyed. The Skagit River which flows parallel to the BNSF tracks just west of Conway could be set afire as the James River in Lynchburg, Virginia was following the derailment/spill/and explosion of a train carrying Baaken crude in 2014. If a derailment and explosion were to occur as an oil train passed through Mount Vernon, downtown Mount Vernon could burn, toxic fumes and flames could spread to Lincoln School, the hospital, the high school and that portion of 1-5 passing through Mount Vernon could be destroyed.</p> <p>Because of their size, unit oil trains, like those carrying Baaken crude to the Tesoro refinery, increase the likelihood that if there is an accident resulting in a spill or explosion, that spill or explosion will be large, making it extremely difficult, if not virtually impossible, to control. All the accidents involving Bakken crude have left first responders helpless.</p> <p>I understand that the Skagit County Planning Department is not responsible for either the tank cars or the tracks, but it is responsible for the impact on the safety and health of the communities and environment surrounding the tracks. It is responsible for permitting projects designed to bring volatile oil through our communities.</p> <p>The final EIS must include detailed analysis of the risk to the communities along the rail route of a unit oil train derailment, explosion and fire occurring.</p> <p>The final EIS must include an analysis of the effectiveness of the type and kind of aid it is possible for first responders to provide if a catastrophic derailment or fiery explosion should occur, including an analysis of the preparedness of local responders and an analysis of the cost of local emergency preparedness-the ongoing training of local responders, the updating of emergency plans, and the replacement of equipment and supplies, including foam.</p> <p>The final EIS must also include an analysis of the type of tank car used to transport Tesoro's crude oil, including an analysis of how that type of tank car has performed historically in derailments. Of note, it was the new design tank cars that were involved in the</p>	

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		<p>May 7, 2014 accident in downtown Lynchburg, Virginia that set the James River on fire.</p> <p>Derailments occur for many reasons. The final EIS must study all the causes of derailments occurring, including but not limited to, a rail breaking underneath a train, an axle breaking, deterioration of wooden ties, a vehicle blocking a crossing, a natural disaster like flooding, a mud slide or an earthquake, and terrorism.</p> <p>The final EIS must take into account all possible causes of derailment and their likelihood of occurrence in Skagit County and elsewhere along the rail corridor, in its analysis of the likelihood of a catastrophic oil train derailment and explosion occurring in Skagit County or elsewhere along the rail corridor.</p> <p>2) Adverse health impacts of unit oil trains on communities through which the trains pass even if they do not derail and explode.</p> <ul style="list-style-type: none"> • Air pollution <p>Diesel engines put unsafe quantities of diesel particulate matter {DPM} into the air. Diesel particulate matter {DPM} has been associated with respiratory and cardiovascular abnormalities, including, but not limited to, lung cancer, heart attacks, strokes, impaired blood vessel function, impaired blood coagulation, congenital heart abnormalities, ventricular hypertrophy, and worsening asthma and emphysema. DPM has been associated with bladder cancer and cancer of the soft tissues. Other toxic air pollutants are also found in diesel locomotive emissions including, but not limited to acrolein, acetaldehyde, formaldehyde, benzene, 1,3-butadiene, and polycyclic aromatic hydrocarbons.</p> <p>The final EIS must contain analysis of the adverse impacts of diesel engine air pollution on the health of people living near the tracks and on workers at the refinery. It must examine the type and number of health problems expected to occur from diesel particulate matter from diesel locomotive engines in all types of weather conditions, including temperature inversions that increase concentrations of air pollutants and wind patterns that affect the distribution of the air pollutants.</p>	

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		<p>Health impacts to all the body's systems must be studied. Both morbidity and mortality must be evaluated. Health impacts over time must be considered and analyzed. Questions like, "How does exposure to diesel particulate matter as an infant, impact the individual's likelihood of developing a respiratory impairment, like asthma, as an adult?" must be asked and answered.</p> <p>The anticipated cost of treatment, short and long term, to each harmed individual must be calculated.</p> <p>The final EIS must analyze how much DPM is put into the air at the Tesoro refinery as the diesel engines idle during the long unloading process. The amount of DPM emitted can be affected by the age and type of locomotive, and by the type of system used by Tesoro to move the tank cars through the unloading facility. For example, does Tesoro require engines with automatic controls to decrease the idling of the engines during the unloading process?</p> <ul style="list-style-type: none"> • Noise pollution <p>Trains are a source of noise pollution with noise generated by their engines, their movement along the tracks, their squeaky wheels and their horns. The length and weight of unit oil trains makes them particularly noisy as they roll and sway along steel rails pulled, when fully loaded, by three or four locomotives. Where I live in Conway, the sound of a passing 100 plus car unit oil train can be heard for several minutes. In Conway the sound effect is amplified by the shaking of the houses as due to Conway's proximity to the Skagit River, the water table is high and ground vibrations are readily transmitted.</p> <p>The Federal Railroad Administration (FRA)'s Train Horn Rule (49 CFR Part 222) requires that locomotive engineers sound their train horns at least 15 seconds in advance of an at-grade crossing. The train horns must be sounded "in a standardized pattern of 2 long, 1 short and 1 long blasts. The pattern must be repeated or prolonged until the lead locomotive or lead cab car occupies the grade crossing." Interestingly, the rule does not regulate the duration of the long and short blasts.</p> <p>In Conway there are 2 at-grade crossings within a stone's throw of</p>	

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		<p>one another. This means that residents of Conway hear a minimum of 8 blasts with each passing train. As the FRA rule doesn't stipulate duration of blast, the horn blasts from some trains are much longer than from others.</p> <p>Noise greater than 55 decibels disturbs sleep. According to the FRA rule, the volume level for a train horn ranges from 96 decibels to 110 decibels. Notably the horns in use are not uniform. Some horn blasts are much louder than others. Typically 4 or more trains pass through Conway every night between midnight and 5 a.m., waking residents multiple times throughout the night. The sleep disturbance experienced by me and other residents of Conway is experienced by a multitude of people living along the rail corridor.</p> <p>Studies have shown harmful health effects from noise and from sleep disturbance including cardiac disturbances-increased blood pressure, increased heart rate, vasoconstriction and arrhythmia-as well as changes in breathing patterns and elevated stress hormones. Poor sleep with its resultant fatigue leads to decreased levels of alertness, thus contributing to increased incidents of accidents, injuries, and premature death. Noise and sleep disturbance in children contribute to poor school performance, learning disorders and the development of mental health problems. Noise and sleep disturbance are associated with depression, including post partum depression, and other mental disorders.</p> <p>The final EIS must include studies of the frequency, duration, type and quality of noise pollution generated by the heavy, mile long unit oil trains travelling to the Tesoro refinery and calculate the risk to each person living in these communities, of developing a physical or mental health problem, taking into account each individual's age and health status. The anticipated monetary cost of treatment, both short and long term,</p> <p>for each harmed individual must be calculated.</p> <p>3) Adverse health impacts of unit oil trains on the health and safety of workers at the Tesoro Refinery.</p> <p>The health and safety of workers at the Tesoro refinery will be</p>	

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		<p>impacted by the same health issues as the public, however their proximity to the sources of pollution and the dangers of derailment with subsequent oil spill, explosion and fire during the transportation, unloading, and refining of crude oil, increases their risk of adverse health and safety impacts.</p> <p>The final EIS must include studies specifically looking at the health impacts of the Tesoro's oil trains on each of the refinery workers, taking into account the age and health condition of each, the amount of exposure to deleterious health effects based on their particular job, including the risk of injury and burns secondary to accidents and oil spills.</p> <p>The final EIS must also study what emergency medical services are available to these workers and the likelihood of each worker receiving adequate aid in time to prevent injury or death if an accident, oil spill or explosion should occur; studies must include evaluations of the skill level of emergency response personnel on the trains and in the refinery, looking carefully at emergency response training requirements of full time union employees and contract workers.</p> <p>Mitigation:</p> <p>Some but not all aspects of the adverse health impacts of oil trains can be mitigated.</p> <p>1) "Quiet Zones" are at-grade crossings where trains will not sound their horns except under emergency circumstances. Quiet zones may serve as possible mitigation for the adverse health impacts of noise pollution. However not all at-grade crossings qualify for consideration as a "quiet zone". According to a 7/22/15 article in the Skagit Valley Herald, "to qualify, a railroad crossing needs to meet a safety threshold set by the Federal Railroad Administration. The risk index takes into account automatic gates, bells and other safety precautions".</p> <p>Before considering quiet zones as mitigation, the final EIS must study how many atgrade crossings in Skagit County would qualify as "quiet zones" and the cost to BNSF and to the taxpayers of converting qualifying at-grade crossings into "quiet zones".</p>	

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		<p>Additionally, the final EIS must study how many residents' physical and mental health will continue to be impacted from the noise pollution at each at-grade crossing that does not qualify as a "quiet zone." However as I discussed earlier the blasting of train horns is not the only source of noise pollution from oil trains. The final EIS must study the frequency, duration, type and quality of noise pollution generated by the heavy, mile long unit trains travelling through "quiet zones", including the sound of crossing gate bells, and calculate the risk to each person living in these communities, of developing a physical or mental health problem, taking into account each individual's age and health status, prior to determining the effectiveness of "quiet zone" mitigation. The anticipated monetary cost of treatment, both short and long term, for each harmed individual must also be calculated.</p> <p>2) The adverse health impacts caused by DPM are not mitigable.</p> <p>3) The adverse health impacts on human health and safety of a catastrophic oil train derailment, explosion, and fire are not mitigable. One death is one too many.</p> <p>Alternative actions: Every oil train passing through Skagit County presents a risk to the public. Any increase in the number of trains, means increased exposure to air pollution, and increased risk of a devastating derailment, spill and explosion.</p> <p>No permit issued for Tesoro's crude unloading facility specifically limited the number of tank cars Tesoro could unload at their facility. As a consequence of this oversight, Tesoro has significantly increased the amount of crude it receives by train since 2011. The draft EIS does not consider the alternative of limiting the number of oil trains travelling to Tesoro, but should. Though limiting the number of trains will not completely eliminate the adverse health impacts from air pollution and the risk of injury and death from a devastating derailment, spill and explosion, it would help to minimize the likelihood of their occurrence.</p> <p>The final EIS must permit this project only if there is a binding limit on oil train traffic to and from Tesoro, and only if it is consistent with the outcome of the litigation between the Swinomish tribe and BNSF concerning the limit on train cars crossing reservation</p>	

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		land.	
Other-0070	Barbara Tuttle	There are also concerns about a possible increase of crude oil train traffic which would result in additional problems for our communities.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0071	David Perk	<p>The final Environmental Impact Statement should correct the following omissions from the draft version:</p> <p>...</p> <p>Prevent Tesoso from increasing crude oil train traffic to the refinery to provide the products needed to create xylene. Down-track communities are already at risk from oil train traffic.</p>	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0072	Richard Johnson	The draft EIS also does not address the impact of increased crude oil train traffic that may occur due to this project. It does not require assurances that no increases in crude oil trains will be permitted in the future.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0073	David Kershner	The draft EIS for Tesoro’s Clean Products Upgrade Project highlights the environmental impacts and risks of increased tanker traffic but does not evaluate the environmental impacts of oil train traffic. If the project increases shipments of crude or reformate to the refinery, which is a possibility, the additional impacts could be significant. The final EIS needs to consider such a scenario.	The proposed project would not include transport of reformate by rail. The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil or reformate to the Tesoro Refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0074	Patricia Young	Burlington Northern Railway does not have a sterling record when it comes to “accidents” and spills of hazardous products. Their new and improved train cars are years away from implementation and their fleet of old and hazardous tankers still abound.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits

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			issued for the proposed project.
Other-0075	Sigrid Asmus	I am a Seattle resident living in BNSF's Blast Zone, already subject to the risk oil trains present in my immediate area, as well as to Seattle itself, that an increase in oil shipments would represent.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0076	Sigrid Asmus	The increased production of xylene for shipment to Asia to be used for manufacturing plastic would also increase the number of oil trains passing through Washington State, in the tunnel beneath the City of Seattle, near my home, and near the homes of hundreds of communities and many thousands of people in a heavily populated area where any spill or explosion could create massive damage.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0077	Ruth Allen	The Draft EIS for the expansion of operations at the Tesoro Anacortes Refinery does not provide adequate assessment of ... increase in train traffic through urban areas	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0078	Mike Allen	The Draft EIS ...is missing accurate calculations for carbon pollution and assurance the project won't increase crude oil train traffic.	The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0079	Alena Wheary	- Impose binding mitigation to ensure that the project will not pave the way for any increase in Tesoro's use of oil trains above current levels;	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits

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			issued for the proposed project.
Other-0080	Jean Gerth	I live in an area that is already heavily impacted by train transportation of dangerous substances. I would like to be reassured that there is not a risk being imposed to my community by trains carrying xylene-related substances. We have already had two train derailments this spring, fortunately the cargo that spilled was corn.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0081	Sally Newell	Since there is no oil production in Washington, all that oil has to be shipped to Anacortes, and the rail part of that journey passes through the Columbia River Gorge National Scenic Area, where I live. An oil train derailed on the Oregon side last year, within sight of my Washington home. If conditions had been normal (west wind at around 25 mph.) on the day of that derailment, my hometown (The Dalles) would have been threatened and lots of country homes west of it would have been lost. They were lucky that day. The wind was flat; that doesn't happen often here. The next time there is an oil train derailed in the Gorge, it may well be catastrophic. In my view, the risk outweighs the benefit.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0082	Carolee Colter	I'm also concerned that this project will allow Tesoro to later ship more oil by rail to Anacortes, with all the safety hazards involved with oil trains.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0083	Sandy Rabinowitz	Tesoro's Draft Environmental Impact Statement does not address the impact of increased crude oil trains traveling to the Tesoro plant.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0084	Carol Sullivan	Please help protect what we have from the dangers listed below. ...	The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project

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		Also, our regional communities must be assured that the project won't increase crude oil train traffic, and that there will not be crude oil export through Skagit County.	description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0085	Clara Cleve	The safety issue is the most pressing. Those trains travel through very populated areas & already have had accidents.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0086	Lael White	The draft EIS falls short on key measures including... increased oil train transport...	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0087	Jess Wallach	Moreover, the draft EIS does not include... the impacts of increased crude oil train traffic. This is grossly irresponsible, considering the safety risks posed by oil trains (recall last summer's oil train derailment and explosion in Mosier, OR...	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0088	Gunnel Clark	Neither does [the draft EIS] require assurances that no increase in crude oil trains will be permitted in the future.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0089	Dena Jensen	We never even had an EIS here for the crude-by-rail trains that are coming to the refineries now, and BP and industry advocates here are trying to pave the way for more trains and crude vessel traffic	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not

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		to come.	analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0090	Laura Ackerman	I don't want the possibility of more oil trains coming through my town of Spokane.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0091	Susan Woods	The second part of xylene production requires a large increase in rail traffic from North Dakota. So all residents and tourists will be caught in even more frequent delays on our roads. We already lose our time, our gas money and create more pollution while waiting. Time is a management problem for all of us. Too much to do and the trains steal our time already. The cargo to be transported is even more volatile than what is being shipped from the Bakken now. Derailments and spills happen. Now we would have a greater threat to public safety. It's not just in Skagit Valley that people wait for the trains to pass. I've waited for Bakken trains miles long in too many places. Not ok to pass this burden to all of us.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0092	Beverly Faxon	...a possible increase in crude oil shipments by train, are also of concern.	The proposed project would not increase transport of crude oil by rail to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro refinery by rail were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0093	Peggy Printz	I would require absolute assurance that no components of this project will be used to facilitate crude export	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-	Polly Freeman	No part of this project can help oil export	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project

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0094			description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0095	Gayle Janzen	We need 100% assurance that NO components of this project would be used to facilitate crude export...	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0096	Dave Popoff	Please include the following cumulative impacts in the scope of the EIS: - The establishment of a marine oil export terminal for petroleum products including xylene as well as any other chemicals potentially produced from minor adjustments to the proposed facility or its operations	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. The existing wharf structure would be used for xylene transfer and shipment. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0097	Dave Popoff	Please include the following cumulative impacts in the scope of the EIS: - The potential for shipping crude oil from the proposed marine oil export terminal without a full environmental impact analysis of the incremental impact.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0098	David Robison	I'm very concerned about the proposed Xylene and potential new oil terminal for Bakken crude in Anacortes.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0099	Robert Bojorquez	The project could also be used to facilitate the export of Bakken crude oil brought in from N. Dakota, shipped on additional oil trains.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-	Ross Reid	I also worry that this is a mere stepping stone for them to begin	The proposed project would not include export of crude oil from

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0100		exporting other oil derived products in larger quantities, further threatening the Salish Sea.	the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0101	Robert Bojorquez	The project could also be used to facilitate the export of Bakken crude oil brought in from N. Dakota, shipped on additional oil trains.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0102	Lisa Ascher	Additionally, the project could also be used to facilitate the export of Bakken crude oil brought in from N. Dakota, shipped on additional oil trains to which I am strongly opposed.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0103	William McPherson	[There should be] no crude oil exports allowed.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0104	Wendy Courtemanche	I ask that Skagit County include language in the final EIS that ... would prevent the new upgrades from being utilized to export crude oil without additional permits and an independent EIS.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0105	Bob Hall	5. I suspect Tesoro is considering shipping crude sometime in the future. The proposed improvements to the wharf would allow this and Tesoro and other oil companies lobbied hard to get the ban on shipping crude lifted. They were successful. Any permit for this project should state that it does not allow for the shipping of crude.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-	Jill Rand	A new marine export terminal in addition to the oil rail terminal is only one step away from crude oil export being manipulated into	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project

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0106		our backyards and shared Salish waters.	description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0107	Jan Gordon	Will this open the door to allowing export of crude oil? It should be written into the permit that it will not.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0108	Eddy Ury	So, you know, we face multiplying risks if Tesoro is going to use its pure capacity also to export unrefined process, bitumen, crude oil, and other projects. You know, though -- And we're just very concerned that, although Tesoro's already issuing crude oil in loading operations [unintelligible] project application, we need to review these permits and look to our written comments for the rest of our points.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0109	Martha Hall	11. We need assurances that the refinery will not use the new and improved wharf that is part of the plan to ship crude to Asia. New permits should required to do this. It appears that the wharf improvements will meet standards for shipping crude. There is a reason why the oil industry lobbied hard to get the ban on shipping crude lifted. They were successful. If the refinery becomes simply a terminal for shipping crude, we are left with few good jobs and a lot of potential pollution. Anacortes and Skagit County should ask that it be written into any approval for this project, that it does not give approval for shipping crude.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0110	Tom Glade	Evergreen Islands is concerned that the DEIS does not adequately address potential impacts of Tesoro's marine export terminal proposed for March Point. In February 2014, Tesoro shipped a large load of Bakken goods in the west [unintelligible] refinery in Kenai, Alaska during turnaround at the Anacortes refinery. Last year, the U.S. crude oil export ban was lifted. And, as a consequence, more marine crude oil export terminals are more unlikely. In Grays Harbor, the Imperium Terminal service oil terminal proposed an export terminal for the transshipment of	The objective of the proposed project is to improve the refinery's capability to deliver cleaner transportation fuels and to produce mixed xylenes. The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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		<p>crude oil, which is now stalled. This year, the Washington State Supreme Court issued the Cordall [phonetic] decision based on the National Resources Act -- that required more evaluation of the Imperium proposal. One of the situations that influence its decision was that the marine vapor combustion unit that would accommodate loading the tanker vessels with crude oil and incinerate vapors displaced during vessel loadings. Tesoro's xylene project proposes a virtually identical marine vapor control system. In Vancouver, Washington, Tesoro Savage has proposed an oil terminal. But the Port of Vancouver has extended its lease and for an additional three months. Tesoro Savage has proposed the largest oil terminal in North America, capable of shipping 360,000 barrels of crude each day. The cities of Vancouver, Washougal, and Spokane, the Columbia River, [unintelligible], Vancouver's Waterfront Development Project, the [unintelligible] Association, the Washington Department DNR, and the Washington Attorney General Bob Ferguson had called on Washington's [unintelligible] Committee to recommend denial. Evergreen Island is concerned that these push for [unintelligible] shift at March Point. If this project moves forward, Tesoro will have a marine oil export terminal capable of exporting Bakken crude oil without the intensive environmental screening that the other marine expert generals in this state have been subjected to.</p>	
Other-0111	Chelsea Blank	<p>Furthermore, the EIS needs to consider the fact that this project allows for the possibility of the crude oil exports from this refinery, which will increase the risks of oil spills and a multitude of other harmful effects on our community.</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0112	Valerie Rose	<p>The EIS must include: ... 2) No backdoor opportunity for Tesoro to export crude oil - and jobs! - without additional permits and an independent EIS.</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-	Tom Glade	<p>the Kinder Morgan transit pipeline will bring 590,000 barrels per day [unintelligible] through Alberta to Vancouver and will be</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions, including the Trans</p>

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0113		<p>shipped out to the Salish Sea [unintelligible] Washington D.C. This shipping will increase the number of oil [unintelligible] from 60 times per year to 676 times per year. Such an increase of [unintelligible] increases the likelihood of accident, leading to an oil spill in the Salish Sea. The traffic risk assessment determines that the accident frequency could increase by 18 percent and that the risk of a 20,000 barrel and larger oil spill continues in [unintelligible] waters will increase by 700 percent. The national -- Kennedy's National Environment at [unintelligible] specifically acknowledges that Kinder Morgan's increased traffic will cause significant adverse impacts to the southern resident killer whale. Tanker and [unintelligible] noise interferes with the whales' navigation and communication skills. Their critical habitat coincides with the [unintelligible] highest risk in oil spill and the destruction of the herring populations, through which the salmon feed, which is the primary source of food for the orcas. Also, the Kinder Morgan Puget Sound pipeline system -- which is a part of the Kinder Morgan pipeline expansion -- is the pipeline that extends down to Washington state, that feeds the refinery at Ferndale and the refineries on March Point. The pipeline system will be increased from 170,000 barrels per day to 225,000 barrels per day -- a 32 percent increase. So the question is, what's Tesoro going to do with this extra tar sand oil and possibly does -- is the process capable of refining that oil, and will Tesoro basically seek to export that oil? Thank you.</p>	<p>Mountain Pipeline Expansion, for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine Transportation – Section 13.6 <p>Additional information regarding potential impacts to Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for regulating marine vessels and for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-	Phyllis Dolph	Skagit County should include language in the final EIS that:...	The proposed project would not include export of crude oil from

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0114		<ul style="list-style-type: none"> Prevents Tesoro from utilizing the upgrades to begin exporting crude oil without additional permits and an independent environmental impact assessment. 	the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0115	Janet StClair	This increase in Bakken Oil use (which comes from fracking, a process that is known by the EPA to pollute underground water sources and involves releasing more toxic air to process) and shipping traffic, means up to five extra tankers a month entering and exiting Fidalgo Bay. A new marine export.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0116	Carl Ullman	8. Oil trans-shipment should not be countenanced. Parts of the proposed project could be used by Tesoro to develop a facility for receiving crude oil and, without processing it, shipping it from the refinery site. This is not part of the existing proposal, and the EIS should specify that the impacts of such a development would require a separate EA, DEIS, and EIS along with the associated permits and certifications. Again, there must be no ambiguity about what is being studied and potentially permitted here.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0117	Sandy Robson	Prevent Tesoro from utilizing the upgrades to begin exporting crude oil without additional permits and an independent environmental impact assessment	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0118	Virginia Wolff	<p>Crude Export Congress lifted the ban on exporting crude oil in December, 2015. Tesoro's proposed merchant terminal project in Vancouver Washington demonstrates that Tesoro is obviously interested in exporting crude brought in by rail. If that project is not permitted (perhaps even if it is), it is reasonable to assume the March Point refinery may be used to export crude directly. There is no limit to the amount of crude stock Tesoro can import other than the physical limitations of pipeline capacity, rail capacity, and dock and storage space needed.</p> <p>It is not in the interests of job creation in Skagit County to facilitate use of the local refineries as crude export terminals, as few</p>	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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		workers are needed in such operations. Additionally, the Dept. of Ecology stated in their 2014 Marine and Rail Oil Transportation Study that: "Each added transfer in the delivery chain [of crude oil] increases the potential for oil spills." The Marine Vapors Emissions Control System which would be constructed as part of Tesoro's CPUP project if permitted is proposed to be used in loading crude oil as well as xylene. If this project is permitted, it must explicitly prohibit use of any infrastructure developed for production and/or transportation of reformat or xylene for the export of crude oil.	
Other-0119	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	The possibility that this project could facilitate crude oil export must be considered.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0120	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities,	Oil trains and Crude Export Shoreline Conditional Use permit should be required The DEIS is almost entirely silent on an issue of major concern to the community: whether this project can or will be used to facilitate additional crude oil transportation. The FEIS must be	The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and

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	<p>ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge</p>	<p>revised to address this question.</p> <p>Ecology’s 2014 Marine and Rail Oil Transportation Study found (page 8): “If the federal ban on oil exports is lifted on U.S.produced oil, then crude oil could move through our state to offshore markets. Each added transfer in the delivery chain increases the potential for oil spills.” There is evidence to indicate that Tesoro Anacortes has been increasing the volume and frequency of crude oil loading operations. According to data from the WA Dept. of Ecology, Tesoro sent two outbound loads of 222,000 bbl and 220,000 bbl crude from Anacortes onto the Overseas Boston on January 8th and February 8th respectively. The Overseas Boston did not return to Washington until it unloaded again at Anacortes on March 21st. The volume of each load was greater than the total volume of outbound crude through Washington piers in the fourth quarter of 2016, 135,000 bbl. It is not clear from currently available data, whether the outbound loads from Tesoro are an anomaly, or indicative of a longterm change in operational uses of the Anacortes pier.</p> <p>The Marine Vapor Emission Control (MVEC) would be used in crude oil loading operations, according to permit applications: “Displaced vapors associated with new refinery loading activities of mixed xylenes product, in addition to vapors from existing gasolinerange materials and crude oil loading operations, will be routed to a new MVEC System...” The FEIS should include an analysis of the cumulative impacts from crude oil loading operations, including a measurement of risk comparing projected future volumes to historical levels. With the lifting of the federal ban on US crude oil export in December 2015, and increasing pressure from Canadian bitumen producers to export through existing infrastructure channels (including Kinder Morgan’s Puget Sound Pipeline spur to Anacortes), there are reasonably foreseeable adverse impacts resulting from increased vessel traffic in the future that would occur as a direct result of crude oil loading operations at the Anacortes pier.</p> <p>If the MVEC is to be used in crude oil loading operations, in addition to the Shoreline Substantial Development Permit, a Shorelines Conditional Use Permit should also be required for any</p>	<p>would not be authorized under permits issued for the proposed project.</p>

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		<p>new and existing equipment used in the process of crude oil loading onto vessels, with a review of the installation's compliance with unclassified conditional uses. Skagit County should only issue Shoreline permits for the MVEC with conditions that it is not to facilitate increases in the volume of crude oil moving through Washington, if not bound for consumption in Washington. Permits for the three new storage tanks should be similarly conditioned to prohibit their use in facilitating crude oil export.</p>	
Other-0121	Evergreen Islands	<p>INTRODUCTION</p> <p>Evergreen Islands has the following major concerns about the likelihood of significant adverse environmental impacts regarding Tesoro's "Clean Products Upgrade (CPU) Project" proposal:</p> <ul style="list-style-type: none"> • The significant increase marine oil shipping in the Salish Sea. • The establishment of a marine petroleum import/export terminal. • The potential for shipping crude oil from Tesoro's proposed marine oil export terminal without a full environmental impact analysis <p>The environmental review of the Tesoro Anacortes' proposed marine export terminal is especially critical in view of the three crude oil export terminals that are currently undergoing intense scrutiny and facing ongoing or potential legal challenges in southwest Washington.</p> <p>Since Tesoro Anacortes's proposed marine export terminal is virtually identical to the three marine oil export terminals in southwest Washington, the Tesoro CPUP DEIS must examine the adverse environmental impacts of shipping both Bakken shale crude oil and Alberta tar sands crude oil through the Salish Sea. Correspondingly, the CPUP DEIS must investigate the environmental impacts of additional Bakken crude oil trains traversing not only Skagit County but also traversing much of Washington state, including many of its cities.</p> <p>The following sections provide background information that justifies our concerns about the potential crude oil export</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>applications or opportunities engendered by Tesoro Anacortes's proposed Clean Product Update project.</p> <p>CONCLUSION</p> <p>Since Tesoro Anacortes's proposed marine export terminal is virtually identical to the three marine oil export terminals in southwest Washington, the Tesoro CPUP DEIS must examine the adverse environmental impacts of shipping both Bakken shale crude oil and Alberta tar sands crude oil through the Salish Sea. Likewise, the CPUP DEIS should investigate the environmental impacts of additional Bakken crude oil trains traversing not only Skagit County but also traversing much of Washington state including many of its cities.</p>	
Other-0122	Evergreen Islands	<p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Revise the CPUP DEIS to address the adverse environmental impacts of shipping both Bakken shale crude oil and Alberta tar sands crude oil through the Salish Sea. Evergreen Islands also recommends that Skagit County pursue the following options in the event that Tesoro's Clean Product Update Project is approved: • Add the permit condition: Tesoro shall not ship any amount of crude oil received at the facility by rail over marine waters, nor in general increase its capacity to ship crude oil over marine waters. • Add the permit condition: Another Environmental Impact Statement shall be completed before Tesoro can export crude oil from its Anacortes refinery, 	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0123	Evergreen Islands	<p>TESORO ANACORTES'S POTENTIAL FOR CRUDE OIL EXPORT</p> <p>Westway and Imperium Expansion Proposed Oil Export Terminals in Grays Harbor</p> <p>The Washington Department of Ecology website⁵ describes the Westway Expansion Project in Grays Harbor as follows:</p> <p>On September 30, 2016, the City of Hoquiam and the Department of Ecology issued the Final EIS for the Westway Expansion Project. Both the Westway Draft EIS and Final EIS found the proposed</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>project would cause significant and unavoidable environmental impacts to health and safety if a crude oil spill, fire or explosion occurs. Both also found the expansion would cause significant impacts in noise, tribal resources and vehicle traffic and safety that would not be mitigated.</p> <p>In January of 2017, the Washington State Supreme Court issued its, <i>Quinault Indian Nation v. Imperium Terminal Services decision</i>⁶, (the Quinault Decision), which included both the Westway and Imperium project. Regarding these projects the Westway project, the Quinault Decision states (emphasis added):</p> <p>Westway plans to expand its existing facility by constructing four aboveground storage tanks for storing crude oil. Each tank will have a capacity of 8.4 million gallons, meaning the entire Westway project will have a capacity of 33.6 million gallons. Westway also plans to expand its rail facility from two short rail spurs to four longer spurs with a total of 76 loading spots. Westway would also add a vapor combustion unit and a structural hose support system to accommodate loading tanker vessels with crude oil. Once complete, Westway's expanded terminal is estimated to receive 403.2 million gallons of oil per year. This is equivalent to two "unit train" transits (one loaded and one empty, with 120 railcars each) every three days. Westway's expansion is estimated to increase the amount of train traffic by up to 243 transits per year. Westway's expansion project is also estimated to increase ocean vessel traffic by up to 120 transits per year."</p> <p>Imperium Terminal Services LLC operates a similar terminal facility next to Westway's in Grays Harbor, also adjacent to the Chehalis River. Like Westway, Imperium applied to expand its bulk liquid storage terminal to allow for the receipt, storage, and shipment of crude oil, biofuels, and other fuel products. This expanded facility "would be served by three independent modes of transportation: water, rail, and truck, each of which would provide pathways for inbound raw materials or outbound products." Imperium's expansion would include construction of nine additional storage tanks, each with a storage capacity of 3.36 million gallons, for a total capacity of 30.24 million gallons. Approximately 6,100 feet of new track would be constructed to expand their current railyard.</p>	

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		<p>Two new pipes would also be constructed, connecting the tank farm with a preexisting shipping terminal. Finally, a marine vapor combustion unit would be installed in order to incinerate vapors displaced during vessel loading. The unit would overhang the harbor's waters.</p> <p>Imperium estimated its expansion project would increase terminal operations up to two unit trains per day (one loaded and one empty), each consisting of 105 tank cars, and would result in up to 200 ships or barges a year. Combined, the Westway and Imperium expansion projects would increase vessel traffic by 520 transits per year and increase train traffic by 973 transits per year. This would be a 310 percent increase in vessel transits and a 133 percent increase in train transits per year through Grays Harbor.</p> <p>They receive petroleum and other fuel products on trains or trucks, transfer the products to temporary holding tanks, and then pipe the products into waiting vessels for further transport. The pipes that these products flow through extend from the coast onto a terminal, a structure located in Grays Harbor. The pipes then deposit the products onto ocean-bound tankers moored to the terminal. Further, the proposals include adding new loading arms and a combustion system on an existing dock.</p> <p>[Figure 3. Westway and Imperium Expansion Projects7 Crude Oil Export Terminal]</p> <p>[Figure 4. Tesoro Anacortes CPUP's Marine Export Terminal and Crude Oil Terminal]</p>	
Other-0124	Evergreen Islands	<p>The Tesoro Savage DEIS also states the following:</p> <p>Up to eight marine vapor combustion units (MVCUs) would be installed on a 50- by 100-foot concrete slab adjacent to the existing Subaru facility. The MVCUs are used to combust hydrocarbons in the vapors expelled from empty marine vessels during the crude oil loading process. Each MVCU would be fitted with a 25-foot-high, 44-inch-diameter, steel exhaust stack. (p. 2-24)</p> <p>Marine vessels would typically arrive with their cargo tanks filled</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>with a combination of inert gases pumped into the tanks to reduce fire and explosion hazards and combustion of vapors from previous cargoes. During loading these cargo tanks would be filled with crude oil and the vapor mixture previously filling the tanks would be displaced. These displaced vapors would be collected and transferred to the MVCU system (comprising eight separate units), which would combust the hydrocarbons in the vapors. To initiate combustion, the vapors would be mixed with small amounts of natural gas and air delivered by blowers. Gases resulting from combustion in the MVCU would be expelled through a stack. (p. 2-50)</p> <p>[Figure 5. Tesoro Savage Oil Export Terminal] [Figure 6. Tesoro Savage Crude-By-Rail Rail Terminal]</p> <p>DISCUSSION</p> <p>The conceptual layout for the Tesoro Anacortes’s Marine Export Terminal is virtually identical to the layouts for the Tesoro Savage Vancouver’s, Westway’s and Imperium’s Crude Oil Export Terminals. These three crude oil export terminals undergoing intense scrutiny and facing ongoing and potential legal challenges in southwest Washington. If the Tesoro Savage Crude Oil Export Terminal is prolonged, Tesoro can potentially export not only Bakken crude oil via unit oil trains or Alberta Tar Sand crude oil via Kinder Morgan’s Puget Sound Pipeline.</p> <p>If Tesoro does opt to export Bakken crude oil-by-rail from March Point rather than Vancouver, the number of additional Bakken crude oil trains traversing not only Skagit County but also traversing much of Washington state including many of its cities will increase. Figure 5 illustrates the impact of oil trains on Washington state and its cities.</p> <p>[Figure 5. Washington State Cities along the "Crude-by-Rail" Oil Train Transportation Routes]</p> <p>The Quinault Decision states, “ORMA is designed to address environmental threats to our coastal waters and specifically addresses the threats posed by increased expansion of the fossil fuel industry along the Pacific Coast.” The Quinault decision also</p>	

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		<p>states (emphasis added), “In this case, an integral part of respondents' projects is loading petroleum products onto ocean vessels to be shipped to refineries.”</p> <p>While the Ocean Resources Management Act (ORMA)⁹ only applies to “Clallam, Jefferson, Grays Harbor, and Pacific counties” and “the waters of the Pacific Ocean seaward from Cape Flattery south to Cape Disappointment,” the following underpinnings of ORMA are directly applicable to the Salish Sea (emphasis added):</p> <p>(1) Washington's coastal waters, seabed, and shorelines are among the most valuable and fragile of its natural resources.</p> <p>(2) Ocean and marine-based industries and activities, such as fishing, aquaculture, tourism, and marine transportation have played a major role in the history of the state and will continue to be important in the future.</p> <p>(3) Washington's coastal waters, seabed, and shorelines are faced with conflicting use demands. Some uses may pose unacceptable environmental or social risks at certain times.</p>	
Other-0125	Evergreen Islands	<p>Marine Export Terminal</p> <p>Essentially Tesoro is proposing to modify its March Point wharf to serve as an oil product export terminal. Tesoro Clean Products Update project proposes to manufacture, store and ship mixed xylenes “by marine vessel via the existing Anacortes wharf facility.”¹⁰</p> <p>Correspondingly, Tesoro’s SEPA checklist¹¹ states that “the proposed Clean Product Update Project will increase vessel traffic in Fidalgo Bay by up to five (5) marine vessels per month for transportation of feedstock and finished products to and from the existing Tesoro Wharf.”</p> <p>The following sections provide background to justify our concerns about the potential crude oil export applications or opportunities provided by Tesoro’s proposed Clean Product Update project.</p> <p>Oil Product Exportation</p> <p>A Reuters’s article¹² in 2014 states the following (emphasis</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>added):</p> <p>Tesoro Corporation (NYSE:TSO) today announced plans to produce petrochemical feedstock in its U.S. West Coast refining system. The Company intends to gather intermediate feedstock, primarily reformate, from its West Coast refining system for xylene extraction at Anacortes, Washington. The initial investment, estimated to be around \$400 million, is designed to recover up to 15,000 barrels per day of mixed xylene. The mixed xylene will mainly be exported to Asia and is used to make polyester fibers and films for clothing, food packaging and beverage containers.</p> <p>Additionally, “supplemental feedstock to the Aromatics Recovery Unit (ARU) will be received from outside sources by marine vessel and unloaded using the existing refinery wharf system.”¹³</p> <p>Tesoro’s Wharf – Existing & Proposed</p> <p>The JARPA application¹⁴ describes the Tesoro’s marine shipping facility (see photo below) as follows (emphasis added):</p> <p>The Tesoro causeway and wharf facilitate marine vessel loading and offloading to and from the refinery.</p> <p>The JARPA application¹⁵ states the that the plans for the proposed CPU Project are plans include the following (emphasis added):</p> <p>Install a new Marine Vapor Emission Control (MVEC) system that will reduce emissions of volatile organic compounds (VOCs). The MVEC System will control hydrocarbon emissions from marine vessels during loading operations.</p> <p>The JARPA application¹⁶ also states ((emphasis added & abbreviations defined)</p> <p>Displaced vapors associated with refinery marine loading activities, including vapors from typical operations and the new project will be routed to a new MVEC System to control hydrocarbon emissions. The displaced marine loading vapors will be collected by vapor hoses routed to the DSU (Dock Safety Unit) consisting of two skid-mounted units positioned on the wharf structure. The DSU is an essential piece of the overall MVEC System that ensures the safety of the marine vessels and the overall MVEC System. The</p>	

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		<p>DSU requires the use of natural gas, which will be provided via a new 3-inch natural gas line routed along the wharf/causeway structure. The vapors exiting the DSU will be routed through an existing line available on the wharf/causeway structure, to the new VCU (Vapor Combustion Unit) located on-shore in the refinery, adjacent to the Wastewater Treatment Plant (WWTP). A natural gas line will also be routed to the VCU to provide support gas to optimize the combustion efficiency. The new natural gas lines to the DSU and VCU will be supplied by an existing natural gas line within the refinery.</p> <p>[Map of project site from http://tesoroanacorteseis.publicmeeting.info/proposedproject]</p> <p>Tesoro Can Import More Bakken Crude Oil Than Originally Planned</p> <p>The SEPA Checklist¹⁷ for Tesoro’s ‘Crude Oil Unit Railcar Unloading Facility’ stated that the facility “will be designed to accommodate one loaded 100 car unit train every other day.”</p> <p>An August 2014 article¹⁸ in the Anacortes American reports that Tesoro plans to import more Bakken crude oil than Tesoro initially declared. The American article states the following (emphasis added):</p> <p>Tesoro Corporation will be shipping more Bakken Shale crude oil to its March Point refinery than originally planned once its new rail unloading facility is up and running.</p> <p>The announcement was made during the company’s 2012 second quarter report on Aug. 1.</p> <p>The refinery originally expected to ship and receive an average of 30,000 barrels of crude per day. The refinery is now permitted to receive 50,000 barrels per day, according to the report. The company announced in March the amount was going up to 40,000 barrels per day with an expected unit train arriving at the facility every other day to start.</p> <p>The most recent numbers add up to one unit train six days a week, President and CEO Greg Goff said, according to Reuters news service. Each unit train will have 100 dedicated rail cars.</p>	

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		<p>The SEPA checklist¹⁹ for the Shell’s “Crude by Rail East Gate Project,” describes Shell oil trains as follows:</p> <p>Shell PSR anticipates that they would receive approximately one unit train per day. Each unit train would include approximately four locomotives and approximately 102 oil tank rail cars containing crude oil. The facility is being designed to receive a maximum of six unit trains per week, for a total of approximately 612 incoming fully loaded oil cars and 612 outgoing empty tank cars on a weekly basis.</p> <p>Kinder Morgan Trans Mountain Pipeline Expansion</p> <p>In Washington State, the Trans Mountain Pipeline²⁰ provides product to the BP Amoco Cherry Point Refinery, Conoco Philips Ferndale Refinery, Tesoro Anacortes Refinery, and the Shell Anacortes Refinery.</p> <p>In December 2013, Kinder Morgan filed “comprehensive application with the NEB (Canada’s National Energy Board)” for the Trans Mountain Pipeline Expansion Project. According to the Kinder Morgan website²¹ (emphasis added), “Filing of the application initiated a regulatory review of the proposed expansion facilities. If the regulatory application process is successful, construction of the new pipeline could begin in 2016. The expanded pipeline would be operational in late 2018.</p> <p>The Kinder Morgan website²² describes the Trans Mountain Pipeline as follows (emphasis added):</p> <p>In operation since 1953, the Trans Mountain pipeline system (TMPL) is the only pipeline system in North America that transports both crude oil and refined products to the west coast. TMPL moves product from Edmonton, Alberta, to marketing terminals and refineries in the central British Columbia region, the Greater Vancouver area and the Puget Sound area in Washington state, as well as to other markets such as California, the U.S. Gulf Coast and overseas through the Westridge marine terminal located in Burnaby, British Columbia. Only crude oil and condensates are shipped into the United States.</p> <p>[Map of Kinder Morgan Pipeline route from</p>	

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		<p>http://www.kindermorgan.com/content/docs/TransMountain_Map.pdf</p> <p>Tesoro's Potential to Ship Bakken Crude Oil to Its Kenai Refinery</p> <p>A June 2013 Petroleum News-Bakken article²³ states, "Tesoro headquarters says there is some discussion about taking the oil, via tanker, to the company's Kenai refinery at Nikiski on Southcentral Alaska's Kenai Peninsula."</p> <p>A later Petroleum News-Bakken article²⁴ in February 2014 states, "Tesoro also shipped a barge load of Bakken crude from the West Coast to its refinery in Kenai, Alaska, in 2013 during a turnaround at the Anacortes refinery in March, with positive economic results."</p> <p>A May 2015 Argus News article²⁵ states the following (emphasis added):</p> <p>'Tesoro will deliver 1.6mn bl of Bakken crude into its Alaska refining system in the first half of 2015 as the midcontinent crude continues to upend traditional west coast slates.'</p> <p>Tesoro plans to use a 360,000 b/d proposed rail offloading terminal in Vancouver, Washington, to supply its west coast refining system including Kenai with greater volumes of Bakken crudes.</p>	
Other-0126	Evergreen Islands	<p>US Export Ban Has Been Lifted</p> <p>On December 18, 2015, after Congress's vote, President Obama signed a bill ending the oil export ban²⁹.</p> <p>A December 2015 Reuter article ³⁰states the following (emphasis added):</p> <p>Houston-based pipeline group Enterprise Products Partners LP (EPD.N) said in a statement it will provide pipeline and marine terminal services to load a 600,000-barrel cargo of domestic light crude oil scheduled for the first week of January.</p> <p>"The company has been actively working with its midstream partners to secure export facilities along the U.S. Gulf Coast, which</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>will maximize the company's crude marketing flexibility going forward," the statement said, adding that Europe, Asia and Latin America are potential markets for U.S. crude.</p> <p>DISCUSSION</p> <p>A summary of the facts presented in this letter is as follows (emphasis added):</p> <ul style="list-style-type: none"> • The Tesoro causeway and wharf facilitate marine vessel loading and offloading to and from the refinery • The MVEC System will control hydrocarbon emissions from marine vessels during loading operations. • Kinder Morgan Trans Mountain Pipeline Expansion is under review. • Both the Tesoro Anacortes Refinery and the proposed Shell Puget Sound Refinery crude oil rail terminals are capable of handling 6 crude oil trains per week each –a total 12 oil trains per week. • Tesoro's proposed marine export terminals at Vancouver and at March Point are conceptually the same – 1) receive an oil product by train, 2) store an oil product, and then 3) export the oil product by tanker or barge. • EFSEC commenced an adjudicative hearing related to the Tesoro Savage crude-by-rail uploading and marine loading facility at the Port of Vancouver, which will be held June 27, 2016 to Friday, July 29, 2016 • "Tesoro also shipped a barge load of Bakken crude from the West Coast to its refinery in Kenai, Alaska, in 2013 during a turnaround at the Anacortes refinery in March, with positive economic results." • On December 18, 2015, after Congress's vote, President Obama signed a bill ending the oil export ban. <p>Based on these facts, the Tesoro's proposed marine export terminal can easily be adapted to ship crude oil rather than xylene. If Tesoro's Vancouver marine export terminal continues to be</p>	

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		<p>delayed or if the terminal is not permitted, Tesoro’s March Point marine export terminal will be a “slam-dunk” way of exporting the crude oil currently destined for Vancouver</p> <p>If the potential for exporting crude oil from March Point is allowed, Tesoro will be skirt the requirements to evaluate the environmental impacts that were required of the Tesoro Savage proposed marine oil terminal in Vancouver</p> <p>CONCLUSION</p> <p>The scoping issues for the Tesoro’s Anacortes Clean Products Upgrade Project must include, at a minimum, the same scoping issues that were included in the EIS for the Tesoro Savage Vancouver Energy Project.</p>	
Other-0127	Evergreen Islands	<ul style="list-style-type: none"> • What is the potential for crude oil exportation from Tesoro’s marine terminal upgrade? • Will the Marine Terminal be used to ship crude oil, especially highly explosive Bakken Crude Oil, to Asia or other refineries overseas? • Will the Marine Terminal be used to ship crude oil, especially highly explosive Bakken Crude Oil, to Tesoro’s Kenai refinery or other West Coast refineries? 	Thank you for your comment. This comment was previously received as part of public scoping and was considered in preparing the Draft EIS.
Other-0128	Liz Lovelett	Lastly, it is important to consider the additional infrastructure at the plant to be for xylene production and shipment exclusively. Any attempt to utilize the infrastructure for the export of crude without the benefit to the workers and community of turning it into a finished product should be permitted with its own process of public involvement.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0129	Richard Johnson	The final EIS should contain language that prevents Tesoro from using the upgrades to begin exporting crude oil without additional permits and independent environmental impacts assessment.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

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Other-0130	Alena Wheary	<p>- Require a shoreline conditional use permit to limit Tesoro's uses for crude oil loading for transport or export.</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0131	Barry Wenger	<p>The DEIS contains several statements regarding the shipping of crude oil at the Tesoro dock facility, however, information detailing the quantities of crude oil transferred and to be treated by the new MVEC System are missing. The existing and proposed crude oil shipments need to be included in the document in order to accurately illustrate and assess the environmental impacts. Certainly there are circumstances e.g. scheduled maintenance & repair, emergencies, etc when crude oil must be moved or stored off-site temporarily - in nearby anchored ships, for instance. These activities set the baseline for crude oil handling which is also needed for the public to understand the current risks and impacts as well as provide a comparison for any future changes in crude oil vessel transport.</p> <p>The Washington State refinery association is firmly behind the recent abolishment of the federal crude export ban to other countries. The federal record and industry journals are replete with evidence to this effect. Skagit County and Ecology need to condition their permits limiting crude oil handling and vessel loading to the existing level as documented above. This would also assure consistency between the Coastal Zone Management Act/Wa St Coastal Zone Management Program/SMA/Skagit SMP and the Marine Management Protection Act/1977 Magnuson Amendment.</p> <p>It should also be noted in the permits that any significant change or proposed change in crude oil vessel transport requires re-permitting and an unclassified shoreline conditional use permit to change from a refinery to a crude oil export facility or to add such a "use". A public permit process is required for any change in use in order for the industry to illustrate the costs and benefits environmentally and economically to the public, and for the</p>	<p>The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>

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		<p>county and state to authorize such shoreline use.</p> <p>The following are the referenced DEIS sources of incomplete information, as annotated: (all caps emphasis added)</p> <p>2.4.2 Existing Refinery Capacity</p> <p>“The refinery receives approximately 120,000 bbl of crude oil each day. Crude oil is received via three transportation methods: marine vessel, pipeline, and rail. Crude oil is supplied to the refinery via pipeline from Canada, via oil tankers from Alaska’s North Slope and foreign sources, and by rail from North Dakota and the central U.S. (Tesoro 2016a). The sources and volume of crude oil received via these three transportation methods vary based on constantly changing business drivers. The delivery of crude oil to the refinery via marine vessel, pipeline, and rail is limited by the current physical constraints of the wharf facility, pipeline, rail unloading facility and refinery infrastructure. THERE ARE NO PERMITTED VOLUME LIMITS OR PERMITTED DAILY LIMITS OF CRUDE OIL RECEIVED THROUGH ANY OF THESE METHODS. The proposed project would not change the refinery’s crude oil processing capacity, the capability to receive crude oil, or the method and number of crude oil deliveries via marine vessel, pipeline, or rail.”</p> <p>The above paragraph suggests that there are no crude oil handling limits, however, the MMPA/1977 Magnuson Amendment states:</p> <p>“No officer, employee, or other official of the Federal Government shall, or shall have authority to, issue, renew, grant, or otherwise approve any permit, license, or other authority for constructing, renovating, modifying, or otherwise altering a terminal, dock, or other facility in, on, or immediately adjacent to, or affecting the navigable waters of Puget Sound, or any other navigable waters in the State of Washington east of Port Angeles, WHICH WILL OR MAY RESULT IN ANY INCREASE IN THE VOLUME OF CRUDE OIL CAPABLE OF BEING HANDLED AT ANY SUCH FACILITY (MEASURED AS OF OCTOBER 18, 1977), OTHER THAN OIL TO BE REFINED FOR CONSUMPTION IN THE STATE OF WASHINGTON.”</p> <p>This certainly sets a 1977 volume limit on permits related to the handling of crude oil at Tesoro and that volume needs to be</p>	

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		<p>determined and the relationship to the crude oil portion of the MVEC treatment assessed and documented. (See additional citations below)</p> <p>2.6.4. New Marine Vapor Emission Control System</p> <p>“A new high efficiency/low emission MVEC System would be used to control volatile hydrocarbon emissions from marine transfer operations. The system would control emissions from the proposed loadings of mixed xylenes product AND EXISTING TRANSFERS OF GASOLINE-RANGE MATERIALS AND CRUDE OIL.”</p> <p>The Ecology Air Program 03/21/17 Technical Support Document at Section 2.2.2.2 on pg. 6 states:</p> <p>“Displaced vapors associated with new refinery loading activities of mixed xylenes product, in addition to vapors from existing gasoline-range materials AND CRUDE OIL LOADING OPERATIONS, will be routed to a new MVEC System...”</p>	
Other-0132	Dirk Vermeeren	Do we/you fully understand the long term negative affects on all our stakeholders and environment when Anacortes becomes the export center for petroleum products to Asia?	Thank you for your comment.
Other-0133	Will McGarvey	Since they may be attempting to increase the amount of crude exported to their refinery in Concord, please reconsider.	The proposed project would not include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-0134	Dave Popoff	In addition, please examine this project's direct, indirect and cumulative impacts, including whether or not the expansion is feasible in light of other local fossil fuel infrastructure projects, or if BNSF is not permitted to transit more than 25 crude oil tank cars per day across the Swinomish Indian Reservation.	The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. The reasonably foreseeable future actions identified in Table 1-2 of the Draft EIS do not include proposals for increased rail traffic to the Shell or Tesoro refineries on March's Point. The

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			<p>project's potential direct, indirect, and cumulative impacts were discussed in the Draft EIS. Please see the Potential Impacts (for direct and indirect impact discussions) and Cumulative Impacts sections in Chapters 3 through 13.</p>
Other-0135	Carl Ullman	<p>I live on Guemes Island, and I want to address in general the point about -- or the test in the DEIS of cumulative impacts. The EIS -- the DEIS needs to take a more careful -- more scrutinous look at the cumulative impacts of not just this project, but other projects that are proposed around here.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine transportation – Section 13.6 <p>Additional information regarding cumulative impacts is provided in the following sections of this Final EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 3.3.4 • Southern Resident killer whales – Section 3.5.1 • Tribal resources – Section 3.8.1 and 3.8.1.5 • Marine spill likelihood – Section 3.9.3
Other-0136	Robin Everett	<p>I'm with the Sierra Club. And I'm here to say that, you know, our Salish Sea is really hurting right now and due to enormous amount of reasons. It's death by a thousand cuts for our orca and the health of the Puget Sound. And so I really approve [unintelligible] when we're calling for a cumulative impact look at every project that we are endorsing in our communities, one by one. It's easy to</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). Cumulative impacts from marine</p>

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		say it's small things. But when you start to add it up, you have a sea that is dying.	<p>transportation including potential impacts on vessel traffic, vessel safety, and spill risks are discussed in Section 13.6. Cumulative impacts on marine and nearshore resources are discussed in Section 7.7 of the Draft EIS.</p> <p>Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these reasonably foreseeable future projects or actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Marine and nearshore resources (including Southern Resident killer whales) – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine transportation – Section 13.6 <p>Additional information regarding cumulative impacts on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Additional information regarding agencies responsible for protecting Southern Resident killer whales under the Endangered Species Act and Marine Mammal Protection Act is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0137	Lawrence Bullis	It is abundantly clear that we would be very foolish to allow Tesoro to manufacture Xylene at the Anacortes refinery. They do too much bad stuff here already. The determination of no significance might be sort of true, were it not for many other things which might also be considered of no or little significance, but added together, small pieces become very significant indeed. We can't just keep adding small pieces to what is already a poison pie. Eventually, it becomes a juggernaut.	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13 of the Draft EIS. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals).</p> <p>In addition to the cumulative impacts discussed in each resource</p>

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			chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts.
Other-0138	Alex Ramel	And I'm asking you to consider future generations and take the long view. Seemingly small steps like a 2 percent increase in vessel traffic, repeated over and over again, are each considered insignificant; but multiplied over the decades, they become significant. We've already done so much to water and our air, that this project will compound those problems. And the DOC study shows that. So, the Final EIS should therefore include a cumulative impact assessment -- particularly on the risks of spills, air pollution, and environmental impacts. Now, I'm not the only one to vote -- or really the overall voice in our community. But please remember that the decisions that you will make will impact me, my generation, my sister's. We have to live with these decisions and the consequences.	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine transportation (including vessel traffic, vessel safety, and spill risk) – Section 13.6 <p>Additional information on cumulative impacts is provided in the following sections of this Final EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 3.3.4 • Southern Resident killer whales – Section 3.5.1 • Tribal resources – Section 3.8.1 and 3.8.1.5 • Marine spill likelihood – Section 3.9.3 <p>Additional information regarding agencies responsible for regulating vessel traffic, spills, and air quality is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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Other-0139	Sally Stapp-Brigham	<p>The May 1, 2017 Sightline Institute online newsletter reports twenty (20) Proposed Liquefied Petroleum Gas export terminals in British Columbia. The BC government boasts their safety record yet in 2014 Plymouth, Washington suffered a huge explosion at an LPG storage site. The Tesoro Environmental Impact Statement finds "less than significant impact" for every step of the process from Construction through Operations and includes 'Unplanned events'.</p> <p>I argue that the Tesoro's proposed Xylene project ignores the CUMULATIVE IMPACT of the many similar projects - proposed, under construction and operating - in the Pacific Northwest that involve importing various fossil fuels via train and pipeline into our region. Please include all such projects in British Columbia, Washington and Oregon. The Tesoro project claims to add "about five additional tankers per month" carrying Xylene to Asia. Please tell us how many Tesoro tankers currently ply our waters monthly and yearly, carrying products other than Xylene. How many more tankers and related vessels does the Shell refinery add? The cumulative impact certainly has to be considered. And who will be keeping track of the "about five" additional tankers? If the numbers I'm asking about are Tesoro's proprietary data that should send up a huge red flag to our community leaders.</p> <p>It is impossible to examine the impact of a single new operation without including the impacts of the existing and proposed facilities. The impact of importing, refining, storing, shipping and exporting environmentally damaging products needs to be studied as a whole. Please pause this madness until the cumulative impacts are studied.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Sections 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine transportation, including potential impacts on vessel traffic – Section 13.6 <p>Additional information on cumulative impacts is provided in the following sections of this Final EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 3.3.4 • Southern Resident killer whales – Section 3.5.1 • Tribal resources – Section 3.8.1 and 3.8.1.5 • Marine spill likelihood – Section 3.9.3
Other-0140	Matthew Anderson	In each of the aforementioned, the xylene plant would amplify the petro chemical hazards already happening here Now!	Thank you for your comment.
Other-0141	Sally Stapp-Brigham	Please reconsider the Tesoro xylene project from the standpoint of the cumulative impact of all fossil fuel projects developed since the 1950's when Shell and Texaco first began refining crude oil into climate damaging petroleum products.	The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13 of the Draft EIS. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or

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			<p>cumulative (WAC 197-11-792(2)(c)). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions(including other actual proposals and future proposals).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change –Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine Transportation – Section 13.6
Other-0142	Sally Stapp-Brigham	<p>Please accept the informative article written by Eric de Place for the Sightline Institute's online newsletter (5/2/17). It presents Department of Ecology data for the first quarter of 2017. It illustrates the cumulative impact of oil-by-rail as refineries, including Tesoro, ratchet up their operations from no refineries in 1950 to having the FIFTH GREATEST CAPACITY in the nation in 2010. The data in this article covers January, February and March 2017 numbers. Please consider this new data as it relates to my concern about the cumulative impact of Tesoro's Xylene project.</p> <p>The link is:</p> <p>http://www.sightline.org/2017/05/02/trains-moved-over-140000-barrels-of-oil-daily-through-washington-this-winter/</p>	Thank you for your comment.
Other-0143	Bob Zeigler	On cumulative impacts the document states: "There are no present or reasonably foreseeable future actions that would impact environmental health resources in the March Point area, therefore cumulative impacts as a result of the proposed project in	The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with

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		<p>addition to the past impacts on environmental health resources associated with refinery development on March Point are considered to be negligible." Is this an accurate statement? It seems there were proposals of increased oil shipment to and though the Anacortes facility by rail and this had been a concern of Swinomish Nation. Is there no longer potential for increased oil via rail to the Anacortes refinery?</p>	<p>transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. The reasonably foreseeable future actions identified in Table 1-2 of the Draft EIS do not include proposals for increased rail traffic to the Shell or Tesoro refineries on March's Point. The project's potential direct, indirect, and cumulative impacts were discussed in the Draft EIS. Please see the Potential Impacts (for direct and indirect impact discussions) and Cumulative Impacts sections in Chapters 3 through 13.</p>
Other-0144	Christine Hansen	<p>It is my understanding that the tankers also would carry reformat (a crude oil product used in the making of xylene. With the possibility of increased tanker traffic in the Salish Sea and beyond, the DEIS also must include a study of how the Salish Sea and other of our waterways (Puget Sound, Strait of Juan de Fuca) would be impacted when factoring in the 34 additional tankers PER MONTH proposed by Kinder Morgan's Trans Mountain Pipeline expansion</p>	<p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3.</p> <p>The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Marine birds – Sections 6.4.2 and 6.4.3 • Marine and nearshore resources – Sections 7.4.2 and 7.4.3 • Vessel traffic , vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5 <p>Reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2. The cumulative project list includes the Trans Mountain Expansion in British Columbia as well as other projects that could increase vessel traffic in the proposed project area. Section 13.6 of the Draft EIS discusses potential cumulative impacts on marine transportation and spill risk.</p>
Other-0145	Phyllis Dolph	<p>The EIS must address adverse cumulative impacts and fairly allocate the burden of addressing cumulative impacts of oil and chemical spills to migratory birds and all the fish and invertebrates and plants that they depend upon.</p> <p>Please eventually deny this project.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource</p>

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			<p>chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Sections 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine transportation – Section 13.6 <p>Additional information regarding cumulative impacts on terrestrial plants and wildlife and marine and nearshore resources is provided in Sections 3.4 and 3.5 of this Final EIS.</p>
Other-0146	Jim Ciecko	<p>Finally, I think that the review of cumulative impacts is less than adequate. There has been a significant increase in impacts to the environment in recent years from such things as oil trains, increased marine traffic, increased air traffic, population growth, etc. There are a number of proposals out there which will add to those impacts. This proposal should be seen as much more significant in light of these activities.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Sections 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine transportation – Section 13.6

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			<p>Additional information regarding cumulative impacts is provided in the following sections of this Final EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 3.3.4 • Southern Resident killer whales – Section 3.5.1 • Tribal resources – Section 3.8.1 and 3.8.1.5 • Marine spill likelihood – Section 3.9.3 <p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p>
Other-0147	San Juan County Council, Jamie Stephens, Bill Watson	Thank you for this opportunity to submit comments and for your attention to all reasonably foreseeable and cumulative impacts to San Juan County from this proposed Project.	Thank you for your comment.
Other-0148	Alexandra Gayek	<p>I have read the fact sheets of this EIS and see the same tendency. Taken by itself, each individual component can look like it has insignificant adverse impact. Therefore, one might be tempted to conclude that the overall project will have insignificant adverse impact. But if one takes into account the reality of the CUMULATIVE AND SYNERGISTIC environmental impact of not only all the individual aspects of this project, but also this project as it adds to the impact of past, current, and future projects, the negative impact becomes significant.</p> <p>For example, the likelihood of each individual ship having a spill may be small. But in the context of all the ships already traversing our local seas, the increased traffic adds significant risk of a spill.</p>	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change –Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8

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			<ul style="list-style-type: none"> • Marine transportation – Section 13.6 <p>Additional information regarding cumulative impacts is provided in the following sections of this Final EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 3.3.4 • Southern Resident killer whales – Section 3.5.1 • Tribal resources – Section 3.8.1 and 3.8.1.5 • Marine spill likelihood – Section 3.9.3
Other-0149	Natalie Menacho	I am concerned that shipping toxic chemicals through our pristine environment will further pave the way for even more export through our home waterways.	Thank you for your comment.
Other-0150	Bob Zeigler	On cumulative impacts the document states: "There are no present or reasonably foreseeable future actions that would impact environmental health resources in the March Point area, therefore cumulative impacts as a result of the proposed project in addition to the past impacts on environmental health resources associated with refinery development on March Point are considered to be negligible." Is this an accurate statement? It seems there were proposals of increased oil shipment to and though the Anacortes facility by rail and this had been a concern of Swinomish Nation. Is there no longer potential for increased oil via rail to the Anacortes refinery?	The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. The reasonably foreseeable future actions identified in Table 1-2 of the Draft EIS do not include proposals for increased rail traffic to the Shell or Tesoro refineries on March's Point. The project's potential direct, indirect, and cumulative impacts were discussed in the Draft EIS. Please see the Potential Impacts (for direct and indirect impact discussions) and Cumulative Impacts sections in Chapters 3 through 13.
Other-0151	Joline Betterndorf	The draft EIS for proposed changes in the Tesoro-Anacortes Refinery is incomplete. Among problems avoided or give short shrift are: 1) consideration of cumulative effects;	<p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in</p>

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			<p>combination with the proposed project, could potentially result in cumulative impacts. Resources potentially impacted by the proposed project in combination with these foreseeable future projects or actions are discussed in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change –Section 4.7 • Marine and nearshore resources – Section 7.7 • Land use and shoreline use – Section 10.6 • Social and economic environment – Section 11.8 • Marine transportation – Section 13.6 <p>Additional information regarding cumulative impacts is provided in the following sections of this Final EIS:</p> <ul style="list-style-type: none"> • Air quality and climate change – Section 3.3.4 • Southern Resident killer whales – Section 3.5.1 • Tribal resources – Section 3.8.1 and 3.8.1.5 • Marine spill likelihood – Section 3.9.3
Other-0152	Sanford Olson	Thank you for this opportunity to submit comments and for your attention to all reasonably foreseeable and cumulative impacts to San Juan County from this proposed Project.	Thank you for your comment.
Other-0153	Susan Lamb	And the cumulative effects of this proposal need to be addressed. Nothing exists in a vacuum.	Each resource chapter in the EIS (Chapters 3 through 13) discusses cumulative impacts. Reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS.
Other-0154	Paula Shafransky	<p>I am writing to say I oppose the following proposed upgrades at the Tesoro facility in Anacortes:</p> <p>Expanding the Naphtha Hydrotreater to remove more sulfur compounds from gasoline;</p> <p>Adding an Isomerization Unit to make additional light hydrocarbons and increase the amount of octane available to the refinery;</p> <p>Constructing an Aromatics Recovery Unit, a unit that produces</p>	Thank you for your comment.

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		<p>mixed xylenes;</p> <p>Installing a steam boiler to provide additional energy to operate the units;</p> <p>Building a Marine Vapor Emissions Control (MVEC) system to capture vapors from marine vessels that come to the dock; and</p> <p>The MVEC involves a small unit on the dock, a new natural gas line along the dock and a small unit on the shore</p> <p>Installing three storage tanks next to the existing tankage area</p> <p>I believe we live in a very special part of the United States and am deeply concerned about our environment. I do not think any of these proposed upgrades would be good for our environment in the long run.</p>	
Other-0155	Mike Conlan	The Tesoro Plant at Anacortes should be shut down - not expanding! For a # of reasons spills land & sea - air pollution and the need of the planet to move away from oil and it's byproducts.	Thank you for your comment.
Other-0156	Velma Schafer	Regarding the article in the Anacortes American...Please do not go the path of Xylene. To destroy our environment by adversely impacting humans and our wonderful bird life on our island is surely sacrilegious. Is money so important to ruin and destroy what our beautiful island has? I think not. I, as I am sure, others in Anacortes will certainly go against you on this.	Thank you for your comment.
Other-0157	Veronica Bush	I believe that the environmental impact outweighs the benefit.	Thank you for your comment.
Other-0158	Kate Waind	I am writing to strongly oppose Tesoro's Anacortes refinery, which would produce xylene, a flammable petrochemical used to make plastic and synthetics, and export 15,000 barrels a day to Asia.	The proposed project would enable Tesoro to produce an average of 15,000 barrels per day of mixed xylenes (see Sections 2.1 and 2.8 of the Draft EIS). The mixed xylenes would be stored in storage tanks in the New Tanks Area and shipped (exported) approximately two times per month by marine vessel via the existing wharf structure.
Other-	Peggy Printz	NO, please. I oppose this project.	Thank you for your comment.

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Other-0160	Sandra Kraus	I am not as familiar as a scientist would be with the specifics of the production involved but I know enough about xylene its potential effects on air quality, marine life, sediments and water quality in such a rich and abundant area that I do not want this “upgrade” of mixed xylene to take place.	Thank you for your comment.
Other-0161	Bonnie Hemphill	This is not the era to be doubling down on fossil fuels. Demand will dry up in half a decade, and we'll be stuck for decades more paying for its cleanup. It'll be a jobs disappointment, as usual, and the land will be too polluted to put anything useful there.	Thank you for your comment.
Other-0162	Gayle Janzen	I urge you to stop this toxic chemical from being made in our state, turning it into a huge chemical and dirty energy export hub. We want to protect the Salish Sea and all its inhabitants but that continues to get more difficult as more tankers ply the waters with toxic cargo bound for foreign shores.	Thank you for your comment.
Other-0163	Mike Conlan	We need to eliminate chemical plants like Tesoro Anacortes. It sits on the Sound and has rail and tankers polluting the area & the constant threat of explosion, leaks, etc.	Thank you for your comment.
Other-0164	Dori Bailey	This will harm the environment. Haven't the oil companies done enough?	Thank you for your comment.
Other-0165	Judith Green	I'm concerned about the water, the air, the land that this project will endanger.	<p>Potential impacts to water, air, and land as a result of the proposed project are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Surface water, groundwater, and wetlands – Sections 5.3.2, 5.4.2, and 5.5.2 • Marine waters and resources – Section 7.4 • Air quality – Section 4.4 • Geologic resources (including soil and landforms) – Section 3.3.2 <p>Additional information regarding potential impacts to air quality</p>

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			<p>and climate change and marine waters and resources is provided in Sections 3.3 and 3.5 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery and the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4
Other-0166	Judith Green	This is for fuels to send to other countries. I think this is wrong. I think this is wrong thinking and I really don't support it. I don't think that this project should go forward.	<p>Tesoro is proposing to install new components and upgrade existing components at the refinery to produce cleaner burning gasoline for the U.S. market and a new product, mixed xylenes, for export to global markets. Tesoro is required to meet the Tier 3 standards in order to continue to sell gasoline in the U.S. market. See Section 1.1, Section 1.2, and Chapter 2 of the Draft EIS for the proposed project description.</p> <p>Mixed xylenes are a key component for manufacturing many consumer products. The U.S. is a primary supplier of xylenes to overseas markets, which are used in the following:</p> <ul style="list-style-type: none"> • Medical films and x-rays • Spray paints • Solvents and cleaners • Synthetic fiber production • Rubber and plastics manufacturing • Industrial printing • Paint thinners • Papermaking
Other-0167	Mike Conlan	Skagit County; You want to eliminate tesoro from Anacortes - sooner or later there will be a catastrophe that will cost the people of Skagit County a lot more than the economic plus the county is getting from having all that oil on an island. DOWNSIZE!!	Thank you for your comment.

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Other-0168	Tim Colton	Skagit County needs to invest more in restoring a healthy Skagit watershed and Puget Sound ecosystem and not in industrial expansions. I am opposed to this proposal.	Thank you for your comment.
Other-0169	Liz Spoerri	I am writing to oppose expansion of the Tesoro Xylene plant.	Thank you for your comment.
Other-0170	Liz Spoerri	I don't believe WA should sacrifice so much and cause so much harm. Clean water, worker safety, climate stability should be our priorities. Please don't underestimate the risk to our communities and the harm this project proposes.	Thank you for your comment.
Other-0171	Helga Burkhardt	The Tesoro project should not go ahead. The environmental impact can not be beneficial. The Anacortes Clean Products Project would add to the Hanford tragedy, a new huge dairy farm and the pollution of the city. The Gorge can not endure more....	The proposed project is located in Skagit County, Washington. Please see Chapter 2 of the Draft EIS for the proposed project description.
Other-0172	Rebecca Canright	I am writing to respectfully oppose the construction and establishment of the xylene production and export facility at the Tesoro-Anacortes refinery in Skagit County.	Thank you for your comment.
Other-0173	Olga Kachook	I would like to speak out in opposition to the proposed project. I believe this project is a step in the wrong direction for our local economy and environment. The risks outweigh any potential benefits.	Thank you for your comment.
Other-0174	Rebecca Canright	Please deny the permit to this xylene production facility.	Thank you for your comment.
Other-0175	Annie McCuen	We are so worried that any Modifications, Improvements, alterations would cause detrimental responses to the environment and wildlife. Please be super responsible, do not think of the mighty dollar only. So much damage has been caused by totally erroneous decisions taken by people who we had thought were good stewards of the earth. Thank you for being honest, kind and	Thank you for your comment.

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		forward thinking. We MUST protect the earth and its wildlife. Anything else is instant gratification which has to be paid for dearly later on.	
Other-0176	Olga Kachook	Please do not move this project forward.	Thank you for your comment.
Other-0177	Robert Bojorquez	Not only is this a huge environmental risk, but a costly one that flies in the face of conservation efforts that have done nothing but benefitted the region. Please do not allow construction of this xylene plant to move forward.	Thank you for your comment.
Other-0178	Tess Morgan	This proposal is not acceptable. The ecological risk outweighs any short term gain or profit for the Chinese Government and international interests who don't value the Columbia River or stewardship.	The proposed project is located in Skagit County, Washington. Please see Chapter 2 of the Draft EIS for the proposed project description.
Other-0179	Maradel Gale	This project should not be allowed to gain any traction, let alone be approved. The chemical it uses is flammable and dangerous.	Thank you for your comment.
Other-0180	Maradel Gale	The product is used to make more of one of the worst polluting products, namely plastics.	Thank you for your comment.
Other-0181	Maradel Gale	There are not enough benefits from this proposal to outweigh the very negative real and potential impacts of allowing this proposal to go forward.	Thank you for your comment.
Other-0182	Kerry	I'm calling to leave a comment against any support for the Tesoro refinery to build their xylene Plant.	Thank you for your comment.
Other-0183	Sandra Chalk	Xylene is a flammable petrochemical used to make plastic and synthetic materials that would be shipped to China How does that benefit our region?	Potential benefits from the proposed project are discussed in the Draft EIS in Sections 2.7.2 and 11.5.2.
Other-	Kerry	It [xylene] is a flammable petrol chemical and it will be shipped to	Thank you for your comment.

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0184		China and we do not want this in our area. No no no.	
Other-0185	Edward John McLeod	Tesoro and the corporate culture in general don't care about sustainability or future generations. They have only a responsibility to their boards and shareholders to make money. Despite Citizens United, corporations are not people.	Thank you for your comment.
Other-0186	Edward John McLeod	<p>Fossil fuels and their byproducts have served the early industrial revolution well and in many ways have brought convenience and mobility to the masses. The time has come and the technologies have evolved now to seriously consider alternatives to packaging, transportation methods and power generation which don't rely on unearthing fossil fuels and all the harmful side effects of doing so.</p> <p>Xylene is bad stuff. It can kill virtually any living organism that is unfortunate enough to have a close encounter of any significance. Most of the plastics it is used for aren't necessary any more, ultimately ending up in landfills, by the side of the road or floating in the great Pacific gyre while very slowly breaking up and killing the sea life and birds that ingest it.</p>	Thank you for your comment.
Other-0187	David Arntson	No xylene plant at Tesoro.	Thank you for your comment.
Other-0188	Priscilla Martinez	We need to take better care of what is left of our environment.	Thank you for your comment.
Other-0189	Rocky Votolato	I am writing to strongly oppose Tesoro's Anacortes refinery.	Thank you for your comment.
Other-0190	Rocky Votolato	Xylene is a flammable petrochemical used to make plastic and synthetic materials that would be shipped to China.	Thank you for your comment.
Other-0191	Rocky Votolato	The people of Washington state deserve better than this.	Thank you for your comment.
Other-	Melissa Ropke	I am writing to strongly oppose Tesoro's Anacortes refinery.	Thank you for your comment.

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Other-0193	Robert Kutter	Please do not approve the new xylene plant.	Thank you for your comment.
Other-0194	Karen Moskowitz	Please do not let this project go forward.	Thank you for your comment.
Other-0195	Thomas Quinn	Enough already!!! We do not need to produce more poison to make more plastic in this world.	Thank you for your comment.
Other-0196	Joan C'deVries	I am writing to express my extremely concerned opposition to a chemical plant being located on our treasure, the Salish Sea. Why risk the beauty and the animal and human life dependent on it, for the sake of the almighty dollar? Time to invest in projects that are sustainable, non polluting, and protect our fragile world .	Thank you for your comment.
Other-0197	Bruce Becker	Do not allow this project to proceed. Air quality, water quality, the tourism industry, and quality of life all militate against it.	<p>Potential impacts to air quality, water quality, tourism, and quality of life resulting from the proposed project are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Air quality – Section 4.4 • Surface water, groundwater, and wetlands – Sections 5.3.2, 5.4.2, and 5.5.2 • Marine waters and resources – Section 7.4 • Environmental health – Chapter 9 • Recreation – Section 10.4.2 • Tourism and recreation – Section 11.5.2.4 <p>Additional information regarding potential impacts to air quality and marine waters and resources is provided in Sections 3.3 and 3.5 of this Final EIS.</p> <p>Measures that would be taken to protect air quality, water quality, tourism, and quality of life are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5

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			<ul style="list-style-type: none"> • Existing operations and controls – Appendix 2-A • Air quality and climate change – Chapter 4 • Human health – Chapter 9 • Marine and nearshore resources – Sections 6.4 and 7.4 • Water quality – Chapter 5 and Section 7.4
Other-0198	Dennis Parent	I am therefore opposed to the expansion of the refineries into the production of xylene. I have painted the broad general reasons above.	Thank you for your comment.
Other-0199	Ruth LeBrun	BOTTOM LINE: We do NOT need increased marine and train traffic carrying toxic substances that risk the fragile air, water and land habitats of Fidalgo Island and Skagit County. We do not need industry that increases our risk for environmental degradation.	Thank you for your comment.
Other-0200	Carole Huffman	I urge the commissioners to vote no. Jobs are important, I recognize that, but more important. I urge our commissioners to please vote against this. I could go on and on but I won't. ... I'm a resident of La Conner and this would directly impact me. I have supported Ron and Lisa in the past. I would urge them to please please vote against against this. It's a health issue.	Thank you for your comment.
Other-0201	Jane Alynn	I have only recently become aware of this project, which has potentially disastrous effects for our community. That I have only recently become aware of this project raises my level of concern.	Information on the release and notification of the Draft EIS is provided in Section 1.4 of the Draft EIS and in Chapter 2 of this Final EIS. Public notice of the Draft EIS was completed in accordance with the SEPA Rules (WAC 197-11-510) and Skagit County Code (SCC 16.12).
Other-0202	Clarity Miller	I vehemently oppose Tesoro's proposed Xylene plant in Anacortes. As a lifelong Anacortes resident and property owner, I do not want to see this plant built.	Thank you for your comment.
Other-0203	Clarity Miller	Please vote no.	Thank you for your comment.
Other-0204	Sarah Sibley	As a member of this community I am ashamed that this production facility is being considered. Yes, it may produce jobs, but at the	Thank you for your comment.

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		<p>cost of life to its employees and surrounding communities.</p> <p>Please be a responsible leader and do not allow this facility to be built.</p>	
Other-0205	Anonymous	And for the environment as a whole it-just seems like it's very narrow sighted.	Thank you for your comment.
Other-0206	Anonymous	I'm against, as many of our neighbors are against, increasing any other refining at the refinery.	Thank you for your comment.
Other-0207	Dorothy	I live in the La Conner. I'm completely completely completely opposed to this xylene project. You should go somewhere else.	Thank you for your comment.
Other-0208	Alberta Finley	I object to Tesoro's request to build a proposed xylene facility.	Thank you for your comment.
Other-0209	Alberta Finley	<p>The hazards of xylene are well documented:</p> <p>...</p> <p>Dangerous to the environment</p>	Thank you for your comment.
Other-0210	John Janson	I attended the public hearing on april 17th and listened to dozens of the speaker comments. there was obvious huge support for the project from workers and their families and from our chamber of commerce for sound and personal reasons. on the other hand, there were countless environmental groups, a 14 yr old student concerned about our and his future, and many residents like me that were in opposition to the project entirely or in some part.	Thank you for your comment.
Other-0211	John Janson	<p>your policies and practices today have profound effect well into the future, and most are irreversible and permanent. a threatened species of plant or animal gets wiped out at your hands. what then? who give you the power over their existence or even their welfare?</p> <p>its not simply all about adding a few dozen jobs and higher tax revenues for our economy. you cant justify anything simply for</p>	Thank you for your comment.

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		those reasons. would the same argument be made if Tesoro were producing chemical warfare weapons, atomic bombs, crack cocaine, or other obvious horrible product? you would have no resistance at all if you were producing and exporting toothpicks, cotton candy and gummy bears. your trade is in toxic, dangerous and environmentally threatening product, and that is at the core of my reluctance to support most everything in your proposals.	
Other-0212	John Janson	I will never give my approval for a package deal that this one is....an all or nothing proposal. separate the wheat from the chaff and you will have my full attention. until then, its thumbs down from me and a multitude of others for the purest of intentions and goals that make obvious good sense for us and our precious environment including the welfare and safety of everything in it. we all need to take the long term approach to our decisions, especially in light of your fossil fuel industry that is obviously in decline and rightly so. don't get me started, as they say.	Thank you for your comment.
Other-0213	Phyllis Dolph	We want this crude oil and xylene expansion to be stopped. This needs to be addressed. Please deny this project. We need to begin to learn how to do without so much dependence on fossil fuels. Little by little, the refineries must be made smaller, not expanded. Please stop this project.	Thank you for your comment.
Other-0214	Phyllis Dolph	I am against Tesoro's Products Upgrade Project. I do not want additions or expansions destined to produce toxic xylene at all.	Thank you for your comment.
Other-0215	Phyllis Dolph	We need to prevent Tesoro from increasing crude and making/transporting xylene.	Thank you for your comment.
Other-0216	LeeAnn Chastain	Please oppose this change and do not allow the addition of xylene production and shipping from Anacortes. This is the time for us to protect our natural resources in the Salish Sea and surrounding areas.	Thank you for your comment.
Other-0217	Ross Reid	I think that this entire project is ridiculous, and we should be shifting our markets towards sustainable practices in markets that	Thank you for your comment.

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		do less harm to our greater world that the proven oil industry.	
Other-0218	Ross Reid	I want ... to put a limited term on the lease of this plant to 5 years in which time the state & public would have the options to review and assess the viability for the plant to continue to operate. I am from here, I was raised in these waters, and Oil Tankers is not the future I want to see for my family and my kids.	Thank you for your comment.
Other-0219	Dan Belcher	I am writing to strongly oppose the Clean Products Upgrade (CPU) Project.	Thank you for your comment.
Other-0220	Robert Bojorquez	<p>Not only is this a huge environmental risk, but a costly one that flies in the face of conservation efforts that have done nothing but benefitted the region.</p> <p>Please do not allow construction of this xylene plant to move forward.</p>	Thank you for your comment.
Other-0221	Lisa Ascher	As a resident of Seattle and environmental steward of Puget Sound, and fish eater, I strongly oppose ANY FURTHER possibility of the Tesoro refinery is proposal to build a \$400 million xylene plant that would increase the risk of a chemical spill in the Salish Sea and increase tanker traffic and greenhouse gases. Xylene is a flammable petrochemical used to make plastic and synthetic materials that would be shipped to China. Our seas are disgustingly full of plastics, our fish are ingesting them, wildlife and the sea are all sick because of it. NO MORE making plastics, let alone shipping them over seas. Our earth cannot take it.	Thank you for your comment.
Other-0222	Lisa Ascher	Thank you for listening and eliminating this proposal. This is the opposite direction to head in for the health of our seas, our sea creatures, our peoples and the earth.	Thank you for your comment.
Other-0223	Lise Grace	I strongly oppose the proposed upgrade to the Tesoro Anacortes refinery, which would enable production of 15,000 barrels a day of xylene, a flammable petrochemical known to be dangerous to public health and marine ecosystems.	Thank you for your comment.

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Other-0224	Karin de Wielle	Let us turn our attention and resources in the right direction. Let's put ourselves on a path we can feel good about. This path will provide countless jobs. There need not be a sacrifice of jobs and people's livelihood. It is a question of what we want to contribute to with our work--danger and climate change or a healthier future for everyone. It is not an issue of employment versus a healthy environment. Surely, we have the ingenuity to accomplish both.	Thank you for your comment.
Other-0225	Gayle Janzen	I am OPPOSED to the proposed upgrade to Tesoro's Anacortes refinery so they can make the highly toxic xylene, a flammable petrochemical used to make plastic and synthetics.	Thank you for your comment.
Other-0226	Steve Knutsen	Most of my relatives and friends live here in Skagit County. I am concerned that they can breathe clean air , drink clean water, and eat wholesome , uncontaminated food grown in our rich soils.	<p>The Draft EIS discusses the potential impacts of the proposed project and the measures that would be taken to avoid or reduce potential impacts. Potential impacts to each of these resources are discussed in the following chapters:</p> <ul style="list-style-type: none"> • Geologic resources, including soils – Chapter 3 • Air quality and climate change – Chapter 4 • Freshwater resources – Chapter 5 • Human health – Chapter 9 <p>Additional information regarding potential impacts to air quality and human health is provided in Sections 3.3 and 3.6 of this Final EIS.</p>
Other-0227	David M Scheer	I am STRONGLY OPPOSED to Tesoro's Anacortes refinery to produce Xylene, a highly toxic, flammable petrochemical used to make plastics and synthetics.	Thank you for your comment.
Other-0228	David M Scheer	DON'T let this project come to fruition!	Thank you for your comment.
Other-0229	Barbara Gregory	A xylene plant on the edge of the beautiful Salish Sea is a really bad idea. The danger to the community of such a flammable substance is too great to let this go forward. not to mention the danger to earth, water and air quality of having tanker rail cars and tanker ships servicing such a facility.	Xylenes are flammable and have a similar flammability to gasoline (see Section 9.6.1 of the Draft EIS). Xylenes are a natural component of crude oil and are found in all diesel and gasoline fuel products. Consequently, the refinery has systems in place to properly handle these types of chemicals, prevent releases,

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			<p>control worker exposures, and respond to incidents. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The Draft EIS discusses the potential impacts of the proposed project and the measures that would be taken to avoid or reduce potential impacts. Potential impacts to the earth, water, and air are discussed in the following chapters:</p> <ul style="list-style-type: none"> • Geologic resources, including soils – Chapter 3 • Air quality and climate change – Chapter 4 • Freshwater resources – Chapter 5 • Marine and nearshore resources – Chapter 7 <p>Additional information regarding potential impacts to air quality and climate change and marine and nearshore resources is provided in Sections 3.3 and 3.5 of this Final EIS.</p>
Other-0230	American Citizen	Oil is dirty. Oil will harm people, our environment and wildlife.	Thank you for your comment.
Other-0231	Maria Magana	It further promotes the emphasis on plastics and other synthetics which we do not need to promote.	Thank you for your comment.
Other-0232	Elena Rumiantseva	I am opposed to Tesoro Anacortes Xylene plant. It is a disaster for the environment and sends a wrong signal about the willingness of our state to do our part to fight global warming and global greed.	Thank you for your comment.
Other-0233	Jeremy Bosworth	I would wish that this project does not go through at all for all the above mentioned reasons....	Thank you for your comment.

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Other-0234	Edward John McLeod	Let's please behave responsibly and make some decisions as if money is not the only driving force. Tesoro is already there, can't do much about that but let's not aggravate the situation and increase the odds of an irreversible calamity. Let's forgo our next environmental superfund site and remember that most past superfund sites have never been fully remediated as promised. In the same vein, most petroleum and chemical spills have never been fully cleaned up and the resulting fines ultimately are never paid in full. Remember, your great grandchildren are going to be born onto this planet as well. As Chief Seattle once said "We didn't inherit this world from our parents, we hold it in trust for our children".	Thank you for your comment.
Other-0235	Sandra Chalk	The fossil fuel era is over! There is no need for the \$400 million xylene plant.	Thank you for your comment.
Other-0236	Lin Meadow	We must not allow more potential petro threats from an industry with a sad record of unsafe practices. My former husband worked at Cherry Point. The stories he told were horrifying. So, I say again. NO, NO, NO!!	Thank you for your comment.
Other-0237	Dwight Rousu	If Trump ignites nuclear war, what would happen with the chemical plant on the waterfront? That is another unknown source of disaster.	Thank you for your comment.
Other-0238	Anne Elkins	I find much to be concerned about in the EIS for Tesoro's Mixed Xylene project.	Thank you for your comment.
Other-0239	Jane Alynn	Xylene, an un-clean, toxic, flammable chemical delivered by an untrustworthy company, doesn't belong in our community. We cannot afford the loss of life, the health risks, the damage to our environment.	Thank you for your comment.
Other-0240	Dennis Parent	I have been following the news that Tesoro has requested to begin producing and shipping the neurotoxin xylene at their Marches Point refinery. As a longtime resident of Bayview, just across the water from Marches Point, I view this development with great	Thank you for your comment.

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		<p>concern. I hope you share my concern, for this is a decision with long term consequences for our valley.</p> <p>I was a lifelong commercial fishermen prior to retiring in 2014. I tell you this because I understand both the need for good paying jobs, and the need to protect our environment, which so many jobs and industries depend upon. Since retiring, I have spent a lot of time volunteering locally for groups like the Skagit Fisheries Enhancement Group, and the Coastal Volunteer Partnership at Padilla Bay. As you know, a lot of effort is being made to save and enhance our beautiful and productive local marine environment, including both Fidalgo and Padilla Bays.</p>	
Other-0241	Phyllis Dolph	<p>We need to stop this project which would add more tankers or barges which would be carrying xylene to Asia. Our whales, the animals down to invertebrates, the salmon, the birds which depend upon food under water: these need our protection.</p>	<p>The Draft EIS discusses the potential impacts of the proposed project from increased traffic and the measures that would be taken to avoid or reduce potential impacts. Potential impacts to marine life and marine birds resulting from increased marine vessel traffic are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Whales and marine wildlife – Section 7.4.2 • Marine birds – Section 6.4.3 <p>Additional information regarding potential impacts to marine birds and other marine and nearshore resources is provided in Sections 3.4 and 3.5 of this Final EIS.</p> <p>Measures that would be taken to protect marine life and birds are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Marine birds – Section 6.4 • Marine life – Section 7.4 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7

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Other-0242	Lydia Marshall	I am adding my voice to those opposed to the Xylene plant. I have a lifelong association with the San Juan Islands and the Salish Sea, and do not believe that producing or shipping a neurotoxin in this fragile environment is wise. I add my voice of concern to those who live and work and in the area and have attended the meetings. There can be no sustainable benefit to exposing nearby residents, the environment and workers to such a dangerous chemical.	Thank you for your comment.
Other-0243	Judy Hammer	Are we really willing to risk contaminating our air, water, marine life and health for 20 jobs that will generate an EPA Top-Ten carcinogen, just to export it to Asia? Really? REALLY???? Skagit County is growing by leaps and bounds WITHOUT needing to add those 20 jobs.	Thank you for your comment.
Other-0244	Judy Hammer	Tesoro Headquarters is 2200 miles away in San Antonio, TX. The pollution is here in Anacortes and Skagit County. The product is going to Asia. All for 20 jobs. Barrell production is 15,000 a day. That's 15,000 opportunities for damage to our health, our precious marine estuaries, our wildlife, marine life, farmlands, crops. Did I mention that Tesoro Headquarters is 2200 miles away in San Antonio, Texas?	Thank you for your comment.
Other-0245	Sarah Lou Weber	As a mother of two children and steward to our Planet Earth I wish for our skagit county commisioners to vote NO and not allow Tesoro's request for a permits to build a facility that produces Xylene.	Thank you for your comment.
Other-0246	Andrea Saxton	The risks of the xylene project on the community & creatures of the Salish Sea are too great!! Please vote no!! on this project.	Thank you for your comment.
Other-0247	Kim McCary	I am very much against the xylene plant proposed for Tesoro in Anacortes.	Thank you for your comment.
Other-0248	Kim McCary	I support alternative energy such as wind and tidal currents, I think it is ill conceived to continue to put dollars into oil-based energy.	Thank you for your comment.

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Other-0249	Gretchen Rowe	I can tell you from experience, we ultimately would be harming ourselves and future generations by bringing this plant in. Our children are already asking us why our ancestors have left them such a mess to clean up. Let's not make it worse.	Thank you for your comment.
Other-0250	Stacy Oaks	Please do not approve the permit for this "upgrade."	Thank you for your comment.
Other-0251	Stacy Oaks	We should be moving away from using plastics-- not building more refineries to make more plastic that will end up in our landfills and our oceans. We must focus more on the long term effects for future generations instead of a decade of monetary profit.	Thank you for your comment.
Other-0252	Roberta Hutton	Tesoro should strive to be a good neighbor. Production of xylene and the pollution and added infrastructure is not being a good neighbor.	Thank you for your comment.
Other-0253	George Reeves	I am very concerned about additional toxic air and water coming from this plant.	<p>The Draft EIS discusses air and water in the following sections:</p> <ul style="list-style-type: none"> • Air emission and air quality – Chapter 4 • Freshwater – Chapter 5 • Marine waters – Chapter 7 <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. The proposed project requires emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards that are developed to protect “sensitive” populations.</p> <p>Additional information regarding proposed project emissions and potential mitigation is provided in Section 3.3 of this Final EIS. Additional information regarding agencies responsible for regulating the emissions from new or modified sources at the facility is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to</p>

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			<p>waters of the state. The proposed project is designed with secondary containment to collect stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery's wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761). The existing NPDES Industrial Stormwater Permit requires that Tesoro capture stormwater that falls within the developed portion of the refinery and treat it at the refinery's wastewater treatment plant. Additional information regarding agencies responsible for regulating stormwater and wastewater is provided in Table 2 in Section 3.1 of this Final EIS. Stormwater management is further described in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Soil erosion – Section 3.3.2.1 • Freshwater resources (including surface water, groundwater, and wetlands) – Sections 5.3.2, 5.4.2, and 5.5.2, respectively • Marine and nearshore resources – Section 7.4
Other-0254	George Reeves	No xylene plant.	Thank you for your comment.
Other-0255	Cathy Schoenberg	This is a terrible idea.	Thank you for your comment.
Other-0256	Cathy Schoenberg	Plastics are headed for extinction, or we are. We need to look to the future: alternatives to plastics that are SAFE.	Thank you for your comment.
Other-	Wendy Courtemanche	As residents of northern WA, we have the right to demand accountability and adequate safety standards be followed by	Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and

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0257		Tesoro if they want to continue to do business here.	Industries, DOSH. The safety measures and procedures that are in place at the refinery are discussed in the Draft EIS. Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment and human health. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS. Additional information regarding agencies responsible for regulating safety is provided in Table 2 in Section 3.1 of this Final EIS.
Other-0258	Barbara J Jackson	I am a retired teacher living in Mount Vernon for the past 28 years. These have been years of great concern for the declining health and welfare of our environment - and for all of Life dependent upon it! There are many aspects of concern about the Tesoro Refinery Xylene Expansion project...increased dangerous trains, ships and tugs with terrible results from accidents that kill and destroy, disastrous outcomes for our whale and salmon populations - just to name a few.	Thank you for your comment.
Other-0259	Barbara J Jackson	My Major Concern is the Environment. The Tesoro Refinery Xylene Expansion project is way beyond any viable consideration for our health, safety, and survival!!! The whole plastic industry is under scrutiny world-wide for its grave, negative consequences to life on planet earth! Please use all of your power to appropriately apply all of our Environmental Guidelines - national, state, and local! Thank you for all you are doing to preserve our remarkable Skagit County and the Life of my family and yours.	Thank you for your comment.
Other-0260	Phyllis Dolph	As a biologist and a citizen, I think this project should be stopped. Protect our whales. Protect the scenic beauty, which is the only reason all of us chose to live here.	Thank you for your comment.
Other-0261	Elizabeth Scholze	I am writing to tell you that I am stridently opposed to granting Tesoro a permits to build a xylene facility and produce xylene in our area.	Thank you for your comment.

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Other-0262	Elizabeth Scholze	<p>The burden of these risks is too great for this lovely, small community and its people.</p> <p>I urge you to deny Tesoro's permit request.</p>	Thank you for your comment.
Other-0263	Ruth LeBrun	<p>3) NO!! - Do not allow "adding a unit" to make high-octane products that can be added to gasoline, and</p> <p>4) ABSOLUTELY NO - Do not allow "adding a unit" to separate mixed xylenes as a separate product.</p>	Thank you for your comment.
Other-0264	Ruth LeBrun	We do not need industry that increases our risk for environmental degradation.	Thank you for your comment.
Other-0265	Jared Howe	I am writing to strongly oppose Tesoro's Anacortes refinery, which would produce xylene, a flammable petrochemical used to make plastic and synthetics, and export 15,000 barrels a day to Asia.	Thank you for your comment.
Other-0266	Jared Howe	The people of Washington state deserve jobs and an environment that are not harmful to their health.	Thank you for your comment.
Other-0267	Rachel Swerdlow	We don't want a xylene plant in our community. Way too dangerous! In fact, no one wants one!!!!	Thank you for your comment.
Other-0268	Phyllis Dolph	As a biologist and a citizen, I think this project should be stopped. So, protect our whales; protect the scenic beauty -- which is the reason all of us choose to live here.	Thank you for your comment.
Other-0269	Colin Stewart	We need to make investments for generations forward and consider the best interest of this Anacortes community; not foreign corporates.	Thank you for your comment.
Other-0270	Libby Mills	I do not support Tesoro's efforts to open a xylene production and export business because of my concern for the marine and estuarine environments, concern for the increased risk of oil train traffic to our community, and for the health and safety of all the workers at the refineries and my friends and neighbors.	Thank you for your comment.

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Other-0271	Annabelle Fox	I strongly object to the Tesoro xylene proposed addition at March Point. This amazing project to our region has put us all at risk, in order for Tesoro to add 20 permanent jobs and big money to their corporate bottom-line.	Thank you for your comment.
Other-0272	Annabelle Fox	The nearly two-year project is not worth the risk of the health and welfare of our community because Tesoro has a need to make additional revenue from processing more fuel efficient gas. Just say no to Tesoro and 20 jobs.	Thank you for your comment.
Other-0273	Emily Fischer	I object to allowing Tesoro's request to expand and upgrade. This is a company that has shown to have repeat EPA violations. The best predictor if future behavior is ALWAYS past behavior, whether it be persons or a company.	Thank you for your comment.
Other-0274	Barb Cross	<p>First or all let me state I am against the proposed project at the Tesoro refinery in Anacortes.</p> <p>There have been engineers, refinery workers, and refinery contractors stating support for this project. The claim being precautions are in place and various “potential impacts” to be “less than significant” on the people, the marine life, and the town. Can they absolutely guarantee this? Do they have a crystal ball to tell exactly what the impact will be in 10 – 20 –30 years?</p>	Thank you for your comment.
Other-0275	Barb Cross	A project supporter commented the opposition is being purely emotional and not considering the facts. Perhaps, but it is really hard not to be emotional when you’re gazing out the window of the Merle Cancer Care Center and wondering about what’s surrounding you in the environment. I’ll continue to look at the refineries and the studies presented to the public skeptically. I do not believe the risk is worth the reward.	Thank you for your comment.
Other-0276	Juliet Miller	I definitely think that the Tesoro project would be detrimental for the Anacortes and Fidalgo Bay area.	Thank you for your comment.
Other-	Juliet Miller	I am clearly opposed to this project and strongly urge the Skagit Co. Planning Commission to oppose the Tesoro products upgrade	Thank you for your comment.

ID	Contact	Comment Text	Response
0277		project.	
Other-0278	Evie Opp	No, no, no! This move to increase shipping traffic is in the complete wrong direction. As a city, we need to be moving away from fossil fuels and all of their toxic byproducts.	Thank you for your comment.
Other-0279	Evie Opp	I'm writing to say, let's find a better option for Anacortes. There are plenty of opportunities for clean/renewable energy and no time to waste!	Developing of a project that would generate renewable energy does not meet the objectives of the proposed project (see Section 1.2 of the Draft EIS). The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS (WAC 197-11-440(5)(b)). Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Reasonable alternatives are considered in Section 2.9 of the Draft EIS.
Other-0280	Louise M Key	Your job is to protect the people within your jurisdiction and do what is in the best interests of the PEOPLE, not any corporation. Once unleashed, there's no turning back. Can you live with yourself if you vote to allow the permit? Think long and hard about this. It's on your head.	Thank you for your comment.
Other-0281	Joan Edwins-Petrick	Having been a resident on Guemes Island and a teacher in Anacortes since 1986 I am adamantly opposed to the Tesoro proposal for a xylene facility.	Thank you for your comment.
Other-0282	Anne Elkins	I do not believe that the Tesoro project, which ultimately will provide only 20 permanent jobs, is worth the many risks to the fragile environment of our waters. Please consider this project far more carefully than you have done in the DEIS.	Thank you for your comment.
Other-0283	Carole Huffman	Any jobs this new facility may create is not worth the lives that could be forever changed for the worse. This could impact the environment and all living creatures in that valley environment for the worse.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0284	Carol Thibeau	The detriment to life is not worth it. Corporate greed should never come before life.	Thank you for your comment.
Other-0285	Jeff Thibeau	The risk to public safety and well being far outweigh the few jobs and enormous profit for the corporation.	Thank you for your comment.
Other-0286	Richard Alspach	Please oppose this project.	Thank you for your comment.
Other-0287	Jill Rand	The Tesoro "Clean Products Upgrade Project" (CPUP) is anything but clean.	Thank you for your comment.
Other-0288	Jill Rand	Please oppose this project and deny the permit. Thank you.	Thank you for your comment.
Other-0289	Dulcie Entermann	Please do not add more toxic substances for the sake of less than 2 dozen jobs, just to make more money for the company.	Thank you for your comment.
Other-0290	Martha Hammer	Maybe it would make sense to slow down the fossil fuel industry's push to extract and export as much fossil fuel as possible and concentrate on being creative and innovative in looking at ways to encourage green and renewable industries that would provide good paying jobs and help in slowing down climate change and leaving a sustainable environment for future generations.	Thank you for your comment.
Other-0291	Sally Stapp-Brigham	Would you rather visit Corpus Cristi, Texas on your next vacation or come to Anacortes, WA.? Under Tesoro's plan to expand their current climate damaging operation by importing more crude oil via railroad tracks then manufacturing toxic Xylene to ship across our fragile Salish Sea to Asia to make more plastic crap to sell to Americans for us to find piling up on our beaches and floating in our Salish Sea. The effects on our own environment already exist. After attending the recent Open House (4/17/17) & listening to Anacortes Chamber of Commerce chairperson cheerlead the devastation of our environment in support of twenty jobs made it was clear to me that our leaders are NOT taking into account the importance of our air, water and land. The wind blowing across	Thank you for your comment.

ID	Contact	Comment Text	Response
		Guemes Channel that evening smelled like chemicals. Already Tesoro is having a negative impact on my life. Don't let them add more pollution! It's a ridiculous plan.	
Other-0292	Alice Lockhart	Please deny this EIS. And folks in this room -- I'm speaking specifically to people in places like the chamber of commerce -- let's start working right now toward a just transition with clean well-paid jobs for Skagit County and elsewhere in Washington.	Thank you for your comment.
Other-0293	Bryan Potter	I oppose the project as presented currently.	Thank you for your comment.
Other-0294	Lawrence Bullis	Would we trust a company who would label a project dealing with production of large quantities of a flammable, highly toxic substance as "clean"? Yes, it "cleans" paint out of brushes. Yes, it is used in making plastics, which are becoming a scourge in our oceans. But, most of all, Tesoro cannot be trusted to act in the public interest. They have demonstrated that very dramatically, even right here in our community.	Thank you for your comment.
Other-0295	Lawrence Bullis	Please do not allow Tesoro to make xylenes here.	Thank you for your comment.
Other-0296	Bryan Potter	The company also continued to spend in excess of one million dollars during recent election cycles on lobbying efforts for those officials who support fewer regulations. In my opinion, the necessary infrastructure is lacking, and the risks are too great to be trusted to an organization unwilling to place safety above profit.	Thank you for your comment.
Other-0297	Nancy Hansen	I know we need no more plastic products manufactured in China to come back here and require recycling when the products fail. In addition, China is sinking in some areas due to the overbuilding of plants to manufacture plastics. They will soon be under water - See The Seattle Times article (originally NY Times) - http://www.seattletimes.com/nation-world/rising-waters-imperil-a-world-of-progress-in-southern-china-delta/	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0298	Nancy Hansen	We are depending upon your hard work on these decisions for survival. Please do not make mistakes at this crucial time in the history of the planet.	Thank you for your comment.
Other-0299	Jim Katrien	And anybody who thinks it's not all -- every oil train, diesel fumes; every coal train, diesel fumes. We've got fumes coming out of both refineries, and they want more. This is -- petroleum is the past. And everyone who spoke in favor of this project only talked to their own or corporate greed. The workers, you're only talking about your own greed. And that is wrong. I'm telling the truth. You are putting garbage on all of us. Each of us in Skagit County is accepting your garbage, and we don't want it. Get other jobs. Get clean jobs and quit this silly game. Petroleum is dead.	Thank you for your comment.
Other-0300	Edward John McLeod	The Pacific Northwest and Puget Sound (the Salish Sea) are one of the few remaining environments that have eluded a major toxic spill disaster so far. Further south into Puget Sound human occupation and corporate disregard have caused serious and consequential damage to the marine environment that, while being recognized, isn't being adequately addressed or remedied. Sadly, this level of human disinterest and disregard is driving our little planet toward unsustainability and peril.	Thank you for your comment.
Other-0301	Edward John McLeod	In looking through many of the previous comments to this EIS it is clear that Tesoro has strongly recommended that it's employees and service providers submit comments supporting the Xylene project which is understandable. Tesoro and the corporate culture in general don't care about sustainability or future generations. They have only a responsibility to their boards and shareholders to make money. Despite Citizens United, corporations are not people.	Thank you for your comment.
Other-0302	Edward John McLeod	Xylene is bad stuff. It can kill virtually any living organism that is unfortunate enough to have a close encounter of any significance. Most of the plastics it is used for aren't necessary any more, ultimately ending up in landfills, by the side of the road or floating in the great Pacific gyre while very slowly breaking up and killing the sea life and birds that ingest it.	Thank you for your comment.

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Other-0303	Maureen Scheetz	And I think creating some kind of substance that's going to be shipped over to China so that they can make crazy things like fleece, that do not disappear over time -- plastic is around pretty much forever. And so anything that's related to any chemical that's going to stay in our environment, I cannot support that. I cannot support any expansion related to that. And I would hope that we all know that, deep down, we are more intelligent than creating something that can be so harmful to our planet.	Thank you for your comment.
Other-0304	Maureen Scheetz	I mean, we're all working so hard for our stormwater, for our bays, for the whales. I mean, this -- it doesn't really make any sense to me, and I hope someone can help share a little light -- shed that light on me, because I'm really in the dark about this. And I haven't even had a chance to read the environmental statement. I didn't prepare any paperwork. I was just asked to come up and give a little bit of heart.	Thank you for your comment.
Other-0305	Constance Snell	In each of the aforementioned, the xylene plant would amplify the petro chemical hazards happening here now.	Thank you for your comment.
Other-0306	Dori Bailey	Leave the environment alone!	Thank you for your comment.
Other-0307	Veronica Nelson	I am urging you to deny expansion of the Tesoro refinery at March Point.	Thank you for your comment.
Other-0308	Veronica Nelson	We do not need more risk of environmental hazards.	Thank you for your comment.
Other-0309	Veronica Nelson	There are already too many environmental risks.	Thank you for your comment.
Other-0310	Veronica Nelson	Please deny their request to endanger us further. Before it's too late.	Thank you for your comment.
Other-	Carlo Voli	Support the production and shipment of the mixed xylenes? No ways. That's a terrible idea. Why would we want to add a new	Thank you for your comment.

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0311		petrochemical plant to this beautiful region, increasing, you know, the toxicities and poisoning our air and water? That makes absolutely no sense.	
Other-0312	Warren Tessler	And this is obviously an enormously complicated project and -- witness the size of the EIS and whatever. And I can't -- certainly can't speak to all of it. But there are certainly, you know, things about this that are problematic -- raised by a number of the people.	Thank you for your comment.
Other-0313	Joanna Schoettler	I come up to the Skagit County every year to come and see the tulips and daffodils and, you know, the wonderful snow geese and all the beautiful things that are up here. And then I keep looking over at the Anacortes and see the pollution going up in the air, and I get concerned. So, now I hear that they want to expand more. And according to the original doctrine -- I mean, they started bringing this gas plant in. They weren't supposed to expand. And, guess what, we're talking about expansion.	Thank you for your comment.
Other-0314	Joanna Schoettler	And instead of putting, you know, more gas and more pollution and more plastic -- plastic clothing -- you know, this stuff is going to our clothing. And now it's going into our washers. And then after getting into our washers, it's going into the sea. And there's a big complaint now -- because there's a lot of plastic in our sea. And it's from all those [unintelligible] being washed out -- whatever it is -- the plastics. And it's just a continual cycle. We cannot do this anymore.	Thank you for your comment.
Other-0315	Joanna Schoettler	Well, this is part of that. It's part of the stuff, saying this is not okay for our environment anymore; and this is not okay for our earth anymore. And if you really start looking at the facts, if you really start looking at what's happening, we need to stop this now. So please, people, think about it. It's not good for your kids. It's giving them cancer. It's not good for the environment. It's killing us. And then you approve it. It's amazing. Think about what you're doing to your families. Please save the tulips.	Thank you for your comment.

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Other-0316	Chelsea Blank	I acknowledge the fact that the refinery is an important component of the economy here and a huge provider of jobs, although I feel that it's more beneficial for the future of all of us and our environment to -- to rather transition to a system which values renewable energy and renewable jobs, rather than rely or depend on fossil fuels for our future. It's unsustainable, and it's not worth it in the long run.	Thank you for your comment.
Other-0317	Peregine O'Gormley	I'm a father of three children, and I recognize that -- he and I drove here tonight -- and we're not done with fossil fuels. We're still working with them. We still utilize them. I think most of the people here drove here this evening. If you didn't, I commend you. So, you know, we definitely are still utilizing that. But we also need to be -- I think most of us also recognize that we need to transition out of that and as rapidly as possible, for all of our sakes. And the best way that I can put it is that we have a contract; if not, you know, morally felt internally. It ought to be written that we have a contract with these guys, with our kids, and with their kids for the future and that they have a future that is sustainable; a future that is -- they've got a planet that's functional for them.	Thank you for your comment.
Other-0318	Julia Sutter	We need to be smarter. We don't have to expand in a rush. I was born -- I'm a second-generation Southern California. When I grew up there, it was pretty rural still. And it's gone. It's just been concreted over. You don't want that here. With some good positive planning and some good creativity, we can keep jobs. We can keep building. We can still keep the refinery. We can utilize it, repurpose it in some way, so that it's a nice welding of the two; and we build a sustainable future. It's pretty much all I have.	Thank you for your comment.
Other-0319	Lexie Bright	Being a part of the upcoming generation, I can tell you most -- if not all -- of Western Washington University is working to transform, improve, and annihilate our old habits of abusing our resources. And it is our turn to make the decisions. We choose the health of our home over money and jobs every time from now on.	Thank you for your comment.
Other-	Stacy Oaks	Local scientists have agreed that we have a very small window to	Thank you for your comment.

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0320		make drastic changes to the way we do things, if we want our children to be able to have a world that they can literally continue to live in. So as any city planning goes on, that needs to be a top priority; not a small part that we look at.	
Other-0321	Edward Laclergue	<p>I am opposed to any increase to ingress or egress of fossil fuels on or through the The Salish Sea! If anything, I would prefer a major decrease via rail, ship, or pipe into or away from the Tesoro Anacortes Plant. To ask about the advisability of an upgrade to the "Clean Products Project" seems akin to asking the question "Have you stopped beating your spouse?" All that an "upgrade" to the Clean Products Project will do is to bring greater chances of polluting the environment on ingress, production, and egress of greater quantities of fossil fuels which will subsequently be burned in internal combustion engines to create more atmospheric pollution. The only solution is to decrease and ultimately eliminate the outmoded use of fossil fuels. If, on the way to that solution they want to "clean" the fuel in the process, then so be it. But only in conjunction with overall decrease (rather than increase) in production and moving toward ultimately eliminating the need for the Tesoro Plant and it's polluting end-products.</p> <p>We Must act locally to protect the environment whenever we can because we cannot look to the current Federal Administration for any help in protecting the environment.</p>	Thank you for your comment.
Other-0322	Erika Davis	I urge you strongly not to approve the expansion of the Tesoro Anacortes facility.	Thank you for your comment.
Other-0323	Robert Gerfy	I object to any expansion of the current refineries in Anacortes.	Thank you for your comment.
Other-0324	Elizabeth Heath	I urge that no expansion occur to the refinery activities or facilities or transport facilities.	Thank you for your comment.
Other-0325	Mike Conlan	Close the plant! The economic perks do not come close to the damage and potential damage it creates,	Thank you for your comment.

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Other-0326	Cathy Schoenberg	Who really benefits? 20 people? At the expense of a large area of many citizens and animals/fish that depend on this area	Thank you for your comment.
Other-0327	Cathy Schoenberg	Beyond the above considerations, I think it is bad planning for the future of our area, petroleum is NOT the future!!!! Just like whale oil, it is PAST, please focus on renewable clean energy for our future generations. Be on top!	Thank you for your comment.
Other-0328	Sharon Stroble	I URGE NO MORE PRODUCTS FOR TESORO -	Thank you for your comment.
Other-0329	Janis Whitcomb	Why do these things get brought here, to the pristine waters and pure air? Why can't we quit making more [stuff] and just use less. I am totally against this and have sat in a park watching the smoke and the ships come in. Hate it. Fear it!	Thank you for your comment.
Other-0330	Sue O'Donnell	Everything about this has a very bad "down-side"! Dangerous chemicals to add to the already dangerous endeavor of refining crude oil into products which are adversely affecting our environment, our health and polluting the seas and air around us on these fragile islands.	Thank you for your comment.
Other-0331	Sue O'Donnell	I would say YES to Tesoro's idea to remove sulfur from gasoline, if this truly would mean a "Clean Products Upgrade". BUT, the very dangerous idea to then use what is left of the gasoline recipe to make XYLENE is a big NO, NO, NO! Degradation of our already questionable air quality! Explosive! Dangerous! Has to be shipped far away! Too much increased tanker traffic!	Thank you for your comment.
Other-0332	Pamelia Maxwell	Please do NOT approve a permit for Tesoro to build a plant that produces potentially dangerous chemicals.	Thank you for your comment.
Other-0333	Carlo Voli	No Xylene Exports	Thank you for your comment.
Other-	Beck Ivie	Please vote NO on the proposed Xylene facility.	Thank you for your comment.

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0334			
Other-0335	Sue O'Donnell	Sincerely, and sickened by the thought of more pollution in this area, I thank you for your concern for our world.	Thank you for your comment.
Other-0336	Sue O'Donnell	Thank you for your efforts to keep us safe. Denying this program will go a long way toward the safety of people and creatures and lands all along the route to China.	Thank you for your comment.
Other-0337	David Henry	Honestly this proposal ranks up there with the nuclear power plant on Samish Island, aluminum plant on Guemes Island and housing development in Padilla Bay. History shows us that they were all really bad ideas.	Thank you for your comment.
Other-0338	David Henry	Our Skagit agriculture lands and rich waters provide the real economic benefit here and considering the toxicity of the neurotoxin xylene and the increase in transportation risks, the Draft EIS needs to go further to protect the waters of Skagit County, Padilla Bay and the Salish Sea.	Thank you for your comment.
Other-0339	Don Robertson	I stand in opposition to the Tesoro expansion. The risks to the marine environment as well as citizens is to great. In addition to the possibility of a man generated disaster we live in an area where it is only a matter of time until we have a major earthquake. Please stand with people and the environment.	Thank you for your comment.
Other-0340	Craig Heverly	How many more serious threats to the health and well-being of Anacortes, the Salish Sea, and the planet and all its inhabitants will we allow Tesoro to make. They are already a serious blight on the earth. No more. Please turn this project down. Thank you.	Thank you for your comment.
Other-0341	Navneal Mangat	Please do all that you can to stop Tesoro's efforts to expand the Tesoro Anacortes plant.	Thank you for your comment.
Other-0342	Janet Overa	Commissioners Please DO NOT approve the draft EIS. I do not want Tesoro to produce and process xylene in Anacortes.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0343	Sharon Levine	My family is opposed to the proposed Tesoro project.	Thank you for your comment.
Other-0344	Sharon Levine	Permits for this project should be denied.	Thank you for your comment.
Other-0345	Roger Wetzel	Please vote No on the Tesoro proposal to produce mixed xylenes at its refinery in Anacortes.	Thank you for your comment.
Other-0346	Kimberly Sims	I am writing to express my opposition to the proposed xylene plant by the Tesoro Corp.	Thank you for your comment.
Other-0347	Arlene French	<p>I'm not sure how a multimillion dollar upgrade, which eventually provides only 20 permanent jobs (what I've read in the paper), is worth the possible dangers to our community.</p> <p>Most of us living here consider the land, air, and water, and wildlife to be of the utmost importance.</p>	Thank you for your comment.
Other-0348	Georgianna Morgan	I don't believe this project merits being built at this location. Washington is a beautiful state and making plastic toxic chemicals (xylene) is not needed over and above the refinery. China can build their own and we can show them since oil is a dying industry which doesn't need our protection anymore...just a goal ?? to continue to eliminate.	Thank you for your comment.
Other-0349	Sally Stapp-Brigham	<p>Tesoro's choice of words for the title of their expansion project made me laugh. Clean Products Upgrade Project??????</p> <p>The boast that their dangerous Xylene manufacturing in the heart of our fragile sea water, fresh water area cannot be even remotely true. There's nothing clean about it.</p>	Thank you for your comment.
Other-0350	Joanna Idczak	I strongly urge you to deny the permit to Tesoro for their proposed new xylene plant, within the urban growth area of the city of Anacortes, Washington. The care and oversights are not strong enough to allow for such a dangerous new endeavor to be	Thank you for your comment.

ID	Contact	Comment Text	Response
		implemented, no matter the temptation for profit.	
Other-0351	Joanna Idczak	There are alternatives to fossil fuel based packaging and clothing. Tesoro desires to have a xylene plant in Anacortes. It does not need to have it. We do not need to have it. We do not want it. Please deny the permit.	Thank you for your comment.
Other-0352	Kathryn Alexandra	I am against this proposal. We have a much too fragile an environment to submit to the risks that come with this project.	Thank you for your comment.
Other-0353	Christine Hansen	This affects every living thing in our communities, and I am against the production and export of xylene in our area. There is just too much potential for irreparable damage.	Thank you for your comment.
Other-0354	Mary Carr	<p>I agree with many in Skagit and San Juan counties that the numerous risks far out weigh any potential benefits.</p> <p>It puts everyone who lives in or visits Skagit and San Juan counties at risk just to add approximately 20 jobs, while adding to Tesoro's corporate bottom line. And that is the point. If Tesoro were really worried about the health and well-being of residents of and visitors to nearby communities, it would consider the communities' environment.</p> <p>If you are to consider the potential for vessel spills, possible earthquakes, the uncertainties about the effects of xylene on wildlife and human health, the impacts of vessel noise on the endangered and declining resident orca population, and the potential increase of greenhouse gas emissions, there would seem to be no way that this project could be approved.</p> <p>I urge you to consider how these issues will contribute not only to degrading the environment, but also to climate change. Please do, because it seems that at present the draft Environmental Impact Statement does not adequately address such potential environmental impacts.</p>	Thank you for your comment.
Other-0355	Robyn Hallonquist	I do not feel that the increased number of jobs or profits for the few outweigh the many negative impacts upon the vast majority of	Thank you for your comment.

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		people in this area and around the world.	
Other-0356	Ruth Holder, Phillip Holder	The proposed project would have probable significant adverse impacts on these people, places, and areas that we and many others in Skagit value.	Thank you for your comment.
Other-0357	Irene Derosier	<p>The proposed production of Xylene by the Tesoro refinery is an audacious and outrageous proposal. Xylene is a highly toxic compound and the proposed manufacturing of it is an unnecessary and untimely product extension for Tesoro to be considering. And to what end? To EXPORT this product to Asia? The protection of the environment and the population living near the plant are far more important considerations than the the narrow profit deliverable that this proposal offers.</p> <p>If the EIS was comprehensive enough to evaluate the true and complete impact of this proposal, it would not even be a serious consideration.</p>	Thank you for your comment.
Other-0358	Millie Magner	Tesoro plan and Xylene are bad for the Salish Sea, Anacortes and all of us.	Thank you for your comment.
Other-0359	Julia Hurd	This entire business is too risky; there's too much at stake.	Thank you for your comment.
Other-0360	Betsy Toll	The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.	Thank you for your comment.
Other-0361	Mark Meeks	I urge priority placed on protecting the air, water, and wildlife and truly recognizing threats to such in determining action.	Thank you for your comment.
Other-0362	Stacy Oaks	We don't need more plastic; don't need more toxic chemicals. Those are the facts we should be looking at.	Thank you for your comment.
Other-0363	Kimberly Sims	I hope that serious though will be given to this proposal and that it will be denied.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0364	Pam Springer	I urge all of you to deny the Xylene project.	Thank you for your comment.
Other-0365	Leonard Hearne	Please do not let this proposal proceed.	Thank you for your comment.
Other-0366	Larry Weymouth	The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.	Thank you for your comment.
Other-0367	Mike Sennett	I also object to the production of xylene for foreign consumption. There is no local or state benefit from this process, but there are substantial risk.	Thank you for your comment.
Other-0368	Richard Broderick	We need to preserve and protect our air, water and soil.	Thank you for your comment.
Other-0369	Kenneth Bosworth	I also have a problem with all the 15,000 barrels going to make more of that wonderful plastic that is filling our oceans as flotsam/jetsam.....without any requirements by users to clean up after themselves. We need monitors for all the chemicals! We need education about the chemicals that are being 'cracked ' right here in Anacortes! We need certain plastics restricted as we continue to realize the damage they do to the environment when washed or used in storage/clothing etc. Thank you for listening/ reading ! More regulations are needed!	Thank you for your comment.
Other-0370	Sarah Broderick	Please deny the permit to Tesoro regarding building a Xylene plant.	Thank you for your comment.
Other-0371	Martin Talarico	Thanks do seeking response. I am opposed to this plan by Tesor.	Thank you for your comment.
Other-0372	Susan Ferrel	I live on Guemes Island, immediately downwind from from the Tesoro refinery and like all residents of the area travel on highway	Thank you for your comment.

ID	Contact	Comment Text	Response
		20 directly adjacent to the railroad tracks that would be carrying the highly volatile crude oil. For reasons of safety concerning oil spills, explosions, air pollution and the effects of toxic xylene spills, I am opposed to the approval for the xylene plant.	
Other-0373	Susan Ferrel	Decisions such as this need to be made with the best interests of the residents, human and otherwise, of our community and the planet and not made solely for the profits of a few, who by the way will suffer the same negative consequences as the rest of us.	Thank you for your comment.
Other-0374	Xochi Rose	The risks inherent in this proposed expansion of Tesoro's product line are enormous, but the benefit to the local population and economy is minimal to nonexistent. This is a lose-lose proposition for community members.	Thank you for your comment.
Other-0375	Xochi Rose	Now is the time to move away from fossil fuels and towards sustainability; now is NOT the time to expand production of Endocrine Disrupting substances right here in the middle of our fishing grounds, farming fields, schools, forests, air, groundwater, and tourist attractions.	Thank you for your comment.
Other-0376	Richard Bell	As a San Juan Island, and King County resident and citizen, I am opposed to this shortsighted vision for our region.	Thank you for your comment.
Other-0377	Jim Ciecko	The net result of producing xylene is increased VOC's, increased green house gas emissions, additional tanker traffic, additional spill risks of a dangerous chemical all for a relatively small economic return. It is the responsibility of the Skagit County government to do what is in the best interest of all its citizens.	Thank you for your comment.
Other-0378	Weldon DeBusk	I oppose development of this project for reasons that are well detailed in Sightline Institute's analyses of this issue. http://www.sightline.org/2016/03/28/public-comment-period-for-tesoros-anacortes-xylene-facility-closes-april-15/ This project is inconsistent with the environmental concerns of this region.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0379	Faye Bartlett	<p>Xylene is a toxic and dangerous compound.</p> <p>Production of it in our area creates a danger to our environment.</p> <p>Profit-making by Tesoro Co. should not be a factor in decision making.</p>	Thank you for your comment.
Other-0380	Jordan Rehm	NO!!!!	Thank you for your comment.
Other-0381	Lynne Oulman	<p>Please consider all the possible externalities of this project. There are costs related to the health and safety of populations and the entire environment. Do the science, and remember that leaks, explosions, and unforeseen outcomes happen all too often. Do corporate profits really outweigh planetary and local health and well being? Do the science, not because someone requires it but because it is the right thing to do. Do the science, it is your fiduciary obligation to safeguard all of us. Let's make sure our children and grandchildren have a habitable planet. Thank you for your consideration,</p>	Thank you for your comment.
Other-0382	Helen Moran	<p>I am a woman of years - 82.</p> <p>I walk by the Harbor and feel blessed by the closeness of the Bay.</p> <p>Close to shore, the surface of the water is placid and beautiful.</p> <p>I do not see the stain of garbage, the tangled nets, the layers beneath .</p> <p>Yet, if I look beyond, my eye catches the outline of oil carrying tanker ships</p> <p>And now the proposed threat of xylene to be carried on more of those ships.</p> <p>They are intruders in this sea of beauty.</p> <p>The waters of the Sea cry for healing</p> <p>Perhaps the Sea will die</p> <p>Then can I say</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		The water is placid and beautiful?	
Other-0383	Sara Holahan	<p>Why would we consider a proposal that will not benefit our community, but that will make huge profits for CEOs in Texas, while increasing marine vessel traffic of toxic substances and ship products to China? Even the Chinese people, eager for economic development as they are,</p> <p>have protested these production plants. Additionally we are looking at importing tons of ammonia, sulfolane and perchloroethylene into our area. We do not need more problems.</p> <p>Skagit County is a precious place and you have a big responsibility to balance our economy, our environment and our future. Please, look deeper into this proposal and formate a real EIS that talks honestly about the dangers and risks we citizens will be facing.</p>	Thank you for your comment.
Other-0384	Scott Johnsen	<p>I do not support the export of xylene by the Tesoro Refinery. The risks are too high to the Salish Sea and other areas.</p> <p>I would like you to completely reassess this project.</p>	Thank you for your comment.
Other-0385	John Carrier	I am hard pressed to understand why expansion of the Tesoro Anacortes facility is being considered.	Thank you for your comment.
Other-0386	Brooke Avery	I just wanted to say that I oppose the expansion of the refinery to include the production of Xylene.	Thank you for your comment.
Other-0387	Brooke Avery	<p>With more and more people moving into the county we should be putting efforts into making our environment a clean and healthy place to live, as well as, to protect the natural beauty and resources that make the Skagit Valley one of the most beautiful places on this planet.</p> <p>Thank you for letting me have a say. I hope you will be worthy protectors of the Skagit Valley and the Salish Sea.</p>	Thank you for your comment.
Other-0388	Anji Ringzin	Tim writing to express my opposition to the chemical Xylene in our waters.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0389	Nancy Quackenbush	My concerns are focused on environmental and economic impacts on tourism; air quality; preservation of my own enjoyment of a way of life; recreational boating; essential ferry traffic; and safety for our sea creatures and their intimate connection in the chain of life that depends upon their well-being;	Thank you for your comment.
Other-0390	Ricarda Burnett	Please DO NOT go ahead with this project! It will be hazardous to our environment and wildlife!	Thank you for your comment.
Other-0391	Jeffrey Jacobs	<p>This proposed project scares a lot of us because of the many aspects of it that can go disastrously wrong. That is why I believe it's a bad decision for Tesoro to begin xylene production and a bad decision for Skagit County to allow it.</p> <p>Thank you in advance for disallowing this proposal to move forward.</p>	Thank you for your comment.
Other-0392	Ken Kraemer	NO NO on the dangerous xyline plant. The environmental and human risks are just to great! NO NO XYLINE PLANT °	Thank you for your comment.
Other-0393	Janet Crossen	ABSOLUTELY NO WAY! The very idea that you would even consider this is OUTRAGEOUS!	Thank you for your comment.
Other-0394	Joyce Lewis	This is a bad decision for MANY REASONS except for PROFIT for a few which will not add anything to our way of life.	Thank you for your comment.
Other-0395	Sylvia Domoto	I OPPOSE THE PERMIT BEING ISSUED FOR TESORO'S PROPOSED FOSSIL FUEL EXPORTS & COMMENTS TO BE MADE ON MAINTAINING EXISTING RULES AND REGULATIONS FOR THE EPA.	Thank you for your comment.
Other-0396	CG Wyatt	I do not support the Tesoro Anacortes upgrade Project	Thank you for your comment.
Other-0397	CG Wyatt	The Xylene project is a bad idea and dangerous to our environment and the lives of the people & animals who live in Anacortes, the Salish Sea, and Skagit Valley.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0398	Mary Ratermann	The expansion of the Tesoro Refinery for purposes of extracting xylene from Bakken crude oil is a terrible idea for so many reasons.	Thank you for your comment.
Other-0399	Mary Ratermann	For each of these reasons, I feel that Tesoro should be denied the permit to produce and ship xylene here in our beautiful Skagit Valley.	Thank you for your comment.
Other-0400	Natasha Meskew	I adamately oppose your plan to ship 120 additional vessels contains xylene to Asia. This is not a safe plan for the Salish region nor is it a wise plan for the climate health of our planet. Stop your production and export of fossil fuels and other toxic substances.	Thank you for your comment.
Other-0401	Natasha Meskew	Say no to greed and to the willful ignorance of shortsighted thinking, and be part of the global effort to protect the purity of our only home.	Thank you for your comment.
Other-0402	Suzanne Myers	This project proposal needs to be denied.	Thank you for your comment.
Other-0403	Suzanne Myers	NO...do not let this proposed project go through!!	Thank you for your comment.
Other-0404	Jenny Weinstein	Xylene is a highly volatile, hazardous and toxic petrochemical which has never before been manufactured in our region and transported through our waters - and we DON'T want to start now!	Thank you for your comment.
Other-0405	Jenny Weinstein	I strongly oppose the Tesoro Anacortes Upgrade Project.	Thank you for your comment.
Other-0406	Janet StClair	I oppose the Tesoro "Clean Products Upgrade Project". This project is anything but clean.	Thank you for your comment.
Other-0407	Janet StClair	We keep our boat in Anacortes and are concerned about tanker traffic, pollution and the safety of our neighbors. Please do not approve this project.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0408	Elisabeth Robson	I am writing to STRONGLY OPPOSE the Tesoro Xylene Refinery in Anacortes, WA.	Thank you for your comment.
Other-0409	Kathleen Lorence-Flanagan	I realize there are both benefits and hazards to having the refineries here. The latest “Tesoro Anacortes Clean Products Upgrade Project”, falls into the latter category in terms of its potential impact on the health of Skagitonians including refinery workers, on marine habitat including the Padilla Bay National Marine Estuarine Research Reserve, on marine life including the endangered Orca whales, on air quality, to name a few.	Thank you for your comment.
Other-0410	Kathleen Lorence-Flanagan	4. One asks, just how much money needs to be made at the expense of our environment? Alone, the CEO of Tesoro received \$13 million in total compensations in 2013. That is more than the lifetime earnings of most people.	Thank you for your comment.
Other-0411	Kathleen Lorence-Flanagan	9. It is known that considerable resources are spent by Tesoro to influence legislation allowing looser regulations in regards to protections of workers, environment, air quality. Can Tesoro be trusted to meet all the provisions cited in the DEIS? With what frequency and by whom will compliance be monitored? In summation, based on the DEIS, I find this project exceedingly worrisome: the goal of cleaner gasoline products seems safe; on so many levels, the goal of mixed xylene production does not. Thank you for your time.	Information regarding the agencies responsible for regulating worker safety, air emissions, and compliance with environmental regulations is provided in various sections of the Draft EIS. Additional information regarding the regulatory agencies is provided in Table 2 in Section 3.1 of this Final EIS. Tesoro conducts inspections and monitoring of the refinery in accordance with applicable regulations. The monitoring program is required to comply, and self-monitoring and reporting is standard practice for permit compliance.
Other-0412	Glen Bruels	To me, the risk far outweighs the potential benefits — especially to those who are living in the potentially affected areas.	Thank you for your comment.
Other-0413	Carl Ullman	I am a resident of Guemes Island and am a downwinder from Tesoro’s refinery given the prevailing winds here, so I am concerned about environmental impacts at the local level as well as the regional and global levels.	Thank you for your comment.
Other-0414	Eileen Smoke	I wish to make my concern and opinion known as to the proposed export of Xylene through the Anacortes port. NO NO NO NO,	Thank you for your comment.

ID	Contact	Comment Text	Response
		Please NO.	
Other-0415	Dorothy Downes	No xylene to breathe in La Conner. China does not need it either.	Thank you for your comment.
Other-0416	Bradley Fox	<p>I strongly object to the proposed Tesoro Xylene plant project at Marches Point for the following reasons</p> <p>Xylene is highly flammable and toxic to humans and the ecosystem. The risk is just too high for the few jobs this project will provide in exchange for lining Tesoro's pockets.</p>	Thank you for your comment.
Other-0417	Bradley Fox	<p>This two year project is just not worth the risk to our health and the welfare of the community</p> <p>Just say no to this project.</p>	Thank you for your comment.
Other-0418	Carolyn Gastellum	<p>The marine environment, the “world class farmlands” (Skagit County comprehensive plan), the mountain and forest ecosystems and the Skagit river habitats are unsurpassed. We must all work diligently to protect these interconnected, fragile, and vulnerable places for our children, grandchildren, and beyond.</p> <p>That is why I am so very concerned about Tesoro’s xylene project and am submitting the following comments on the DEIS due to the negative impacts this project will have on present and future generations.</p>	Thank you for your comment.
Other-0419	Carolyn Gastellum	In addition to my own comments, I agree with the comments submitted by Phillip and Mary Ruth Holder, 201 S. 7th St., Mount Vernon, WA on May 2, 2017.	Thank you for your comment.
Other-0420	Ruth Holder, Phillip Holder	The proposed project would have probable significant adverse impacts on the natural and human environment that we and many others in Skagit treasure. The impacts of this project on our climate, the Salish Sea, refinery workers, and the surrounding communities make it clear that the project as presented in the DEIS should not be permitted.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0421	Glen Hendrick	I'm calling to comment on the Tesoro xylene production proposal and I just think that it's a terrible idea. Everybody here thinks it's a terrible idea. We don't want this happening in our waters. Xylene is super toxic	Thank you for your comment.
Other-0422	Christa Simmons	The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous and noxious substance.	Thank you for your comment.
Other-0423	Debra Poscharscky	No more fossil fuels to make billionaires rich and to kill our world...No, No, NO! Can you say renewables???	Thank you for your comment.
Other-0424	Beth Wallace	I urge public officials to act for the greater good and reject the proposal.	Thank you for your comment.
Other-0425	Barbara Aguero	My concerns about the xylene project are many.	Thank you for your comment.
Other-0426	Sharon Belk-Krebs	I am against the Tesoro Anacortes xylene proposal. The risks are too great. Count another no vote.	Thank you for your comment.
Other-0427	Tony Idczak	I have been a resident of Anacortes since 2004 and am strongly opposed to letting Tesoro build and operate a xylene production plant at its refinery here.	Thank you for your comment.
Other-0428	Gwen Hunter	We simply don't need to unearth & transport any more toxic stuff: there's plenty on our Mother & in our systems already. China is going green. Most of our trade partners are headed towards green power. Please think ahead and say NO! to this insane attack on our nation!	Thank you for your comment.
Other-0429	Maureen Scheetz	This is not a clean product upgrade. This would be a turn for the worse for everything in our environment. It is unwise to create a product that does not benefit or provide a healthy outcome. This is a waste of our natural resources. Xylene products are losing money in the markets. How can we	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>rationalize creating a product that is used to make plastics that never decompose in our environment?</p> <p>Our community deserves a clean industry that provides for our future needs. Examples are solar power and wind energy.</p> <p>...</p> <p>Refineries should clean up their messes they have already created. NO xylene! The quality of Life and water should not be destroyed by local Industry. This xylene plant industry is not worth the jobs, the construction or the costs.</p> <p>Always consider the environment first!</p>	
Other-0430	Joanna Schoettler	I am against this proposal.	Thank you for your comment.
Other-0431	Anonymous	You guys just go away and find another place to build your garbage no not up here. Why don't you put it somewhere where a bunch of politicians live why don't you put it somewhere where there's nobody who cares about the environment put it in somebody's backyard who doesn't care but no not here.	Thank you for your comment.
Other-0432	Anonymous	So no we say no take it somewhere else take your garbage anywhere somewhere else but not here.	Thank you for your comment.
Other-0433	Alexandra Gayek	<p>I am also aware of the tendency of anyone in business, especially in our current federal administrative environment, to value short term profits over long term environmental and human health. The weakening, if not outright destruction of the EPA, means that if this project is built, there will be limited, if any, enforcement of any measures to protect the environment and human health, no matter what the EIS claims to promise. There will therefore be no incentive for Tesaro to honor any of its promises of installing or maintaining costly safety measures of any kind.</p> <p>For these two reasons, I urge the Skagit County Planning and Development Department to reject this proposal and not permit this project to move forward</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0434	Deejah Sherman-Peterson, Ron Sherman-Peterson	Our world does not need any more plastic. We need to reuse the plastic we have already manufactured and which contaminates the land and water, ending up in the stomachs and intestines of birds and marine animals. We are all part of an interdependent web of life; what affects these creatures also affects humans. We have a moral imperative to prevent further damage.	Thank you for your comment.
Other-0435	Devon Oliver	<p>Please do not expand your facility to allow manufacture and shipping of xylene. "20 permanent jobs" are not worth the risk of spills, explosions, changing of air, water and contributions to climate change. Our climate as is allows progression of life for our offspring. Ever expansion is disastrous to the finite planet.</p> <p>Will this request stand up to the money that will be made for business interest?</p>	Thank you for your comment.
Other-0436	Erin Libby	<p>The essential truth is that we do not need oil , coal or gas. Other sources of energy are available.</p> <p>What we need is a concerted effort to switch our infrastructure, down to the make of the kitchen stove. All of your funding, your critical skills, your advertising budget should be directed toward getting us to a safer, sustainable last minute save for our planet. In stead of polluting the oceans, trashing the land, and churning toxins into the atmosphere, you could help save us from a catastrophic folly.</p> <p>Folly is when leaders fail to listen to the wise people around them and proceed toward certain failure with blinders on.</p> <p>What you are proposing is Folly.</p> <p>Deadly Folly.</p>	Thank you for your comment.
Other-0437	Susan Lamb	Approving this project may help Tesoro's future but it will endanger and harm ours and our children's and their children's futures.	Thank you for your comment.
Other-	Robin McGee	I live in Snohomish County, and we do not need the toxic chemicals and waste that are being planned for Tesoro in	Thank you for your comment.

ID	Contact	Comment Text	Response
0438		Anacortes.	
Other-0439	David Kershner	<p>I am writing to express my support for the no action alternative and highlight some changes that are needed in the final EIS.</p> <p>Given the significant adverse impacts of xylene production, our world needs to reduce, not increase, its consumption of xylene. According to the Agency for Toxic Substances and Disease Registry, xylene is moderately toxic to the human central nervous system and can be deadly to animals in very large quantities. Many of our plastics made with xylene as a feedstock are disposable and could be replaced with reusable materials. Also, plant-based or algae-based alternatives to petroleum-derived plastics are already being produced and will come down in price as demand increases.</p>	Thank you for your comment.
Other-0440	Ann Brooking	<p>More broadly the impact of investing in additional fossil fuel products and our global future worries me. I have children and they are perplexed by our generation's disregard for the state of the planet and the plight their children no doubt face if we continue to invest in fossil fuel industries.</p>	Thank you for your comment.
Other-0441	Harlan Shober	<p>Please look at the big picture. Any project that serves to increase the use of fossil fuels is a step in the wrong direction. We need decision-makers to think long term. Please insist on a full review of the impacts of Tesoro's proposed expansion.</p>	Thank you for your comment.
Other-0442	Patricia Young	<p>I am alarmed, shocked and dismayed that the County would even consider granting Tesoro /Anacortes a permit to expand their facility to export xylene.</p> <p>If ever there was an intentional misnomer, its proposal, "Clean Products Upgrade (CPU) Project" takes the prize. While Tesoro probably needs to upgrade its facility, xylene by no stretch of the imagination could ever be considered a "clean product." It is a highly flammable petrochemical used to make more climate and environmental compromising plastic and synthetic products. Getting xylene to China from Anacortes includes many perilous stages</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0443	Patricia Young	For a handful of jobs, are you willing to squander this precious area? My fervent hope is that integrity wins.	Thank you for your comment.
Other-0444	Pam Bosch	<p>This is not the type of investment that is good for Washington, for our citizens, our progeny, or our ability to create a healthy economy.</p> <p>Increasing incentives for petrochemical dependence is inappropriate and unethical. The truth is that clean, regenerative sources of energy are growing 12 times faster than the rest of the economy.</p>	Thank you for your comment.
Other-0445	Greg Oaks	Clean product, I think that's a real euphemism. ...,I live on Orcas Island and I wanna strongly object to the xylene export out of the Tesoro plan.	Thank you for your comment.
Other-0446	Heather Oaks	I'm calling to register my negativity on the Tesoro refinery xylene project.	Thank you for your comment.
Other-0447	Heather Oaks	I really want to register my protest.	Thank you for your comment.
Other-0448	Susan Fahey	<p>Please consider the cautions provided by the Sightline Institute, the National Institute of Health, Re-resources for Sustainable Communities, as well as many concerned local residents, regarding the proposed production and export of xylene at the Anacortes Tesoro Refinery. See http://www.re-resources.org/tesoroxylene.</p> <p>While I do not have the expertise to comment on the specifics in the Draft EIS it is clear to anyone who pays attention to the hazards inherent in the transport and handling of petroleum products that there are many dangers to address.</p> <p>I hope that you will deny this application. Why should we sacrifice environmental and human health in Skagit County so this company may profit by the production and exportation of such a dangerous chemical?</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0449	Kerry Koski	I wanted to just weigh in and say that I'm against is xylene project. I think it hasn't, well first of all we need to be transitioning away from these type of products not getting in more.	Thank you for your comment.
Other-0450	Sigrid Asmus	Washington State cannot afford to hand over the future of the Salish Sea to unaccountable corporate interests. It is imperative that Skagit County act wisely to protect the future of our shoreline environment, as well as the hundreds of communities across the state that may be affected by any increase in oil transport by train or pipeline.	Thank you for your comment.
Other-0451	Gay Wilmerding	I am very concerned about the proposed production of xylene because it's a dated industry and hopefully we're moving away from that.	Thank you for your comment.
Other-0452	Ursula Mass	A Petrochemical Highway is in the making. There are numerous facts why the project is a terrible idea.	Thank you for your comment.
Other-0453	Sigrid Asmus	<p>This is not the time to strip protections from Washington's irreplaceable environment.</p> <p>Our environment and its livable future need to be protected from the unaccountable interests intent only on exploiting it -- no matter how destructively -- for private, short-term gain. I ask that the Board use its fullest authority to do a full EIS, and that every effort be made to require that our people, Tribes, fisheries, and future be protected from the threat and reality of the unsustainable damage that the Tesoro project represents.</p> <p>We cannot afford to destroy our environment -- there is no Planet B.</p>	Thank you for your comment.
Other-0454	Terri Vincent	I am writing to object to the manufacture and export of xylene by your refinery. If Asia wants xylene, then let them make it themselves. Don't risk the beauty of our Washington State by shipping such a dangerous product to another part of the world. Let them take the risk.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0455	Marlena Kellogg	Hi my name is Marlena Kellogg. I'm a Bellingham resident and I strongly disapproved the Tesoro refinery building.	Thank you for your comment.
Other-0456	Donovan Williams	This proposed resource extraction project needs to be halted. There are many people like myself that are concerned with the environment - just last year there were four activists that shut down pipelines in the northern part of the country, there are activists doing things all the time to save the environment for more destruction from the humans.	Thank you for your comment.
Other-0457	Teresa Catford	Why should the people of Washington State bear all the costs and none of the benefits of this xylene plant? Tesoro stands to gain financially and the rest of us and the environment loses.	Thank you for your comment.
Other-0458	Kari Graydon	This is not safe and not wise.	Thank you for your comment.
Other-0459	Kim Rice	I am strongly opposed to the proposal of the Tesoro refinery in Anacortes, WA to manufacture xylene for export to Asia via tankers traversing the Salish Seas. I am opposed for many reasons including local environmental degradation.	Thank you for your comment.
Other-0460	Janice Wheadon	"Tesoro" means treasure, doesn't it? How ironic! What you plan to do will threaten a REAL treasure--the Salish Sea and all the creatures in it. Please reconsider. Show the world that a refinery does not have to be rapacious but can be part of the solution.	Thank you for your comment.
Other-0461	Jeanne Kleyn	Please refuse Tesoro's proposed projects.	Thank you for your comment.
Other-0462	Ed Gastellum	My wife and I are residents in close proximity to the two refinery's and find that they are not necessarily the best neighbors for many reasons.	Thank you for your comment.
Other-	Jeanne Kleyn	If the proposed projects are refused, the refinery would continue	Thank you for your comment.

ID	Contact	Comment Text	Response
0463		to operate as it does today, possibly (but not necessarily) in a reduced capacity. As a resident of Skagit County with a strong interest in health of people and the environment, this seems like a good outcome.	
Other-0464	Penelope Haskew	As a resident of San Juan County I strongly oppose the establishment of a xylene manufacturing and transport business at the Anacortes Tesoro refinery. The increased shipping traffic, the risk of a catastrophic spill and the impacts of the traffic and the increased noise on our native and endangered orca whales is more than enough reason to nix the project.	Thank you for your comment.
Other-0465	Natalie Menacho	Please choose health and safety. Please do not ship Xylene through the Salish Sea.	Thank you for your comment.
Other-0466	Christine Leonard	I am very concerned about the negative impact the expansion would have on the immediate area of the Refinery and it's surrounding land and aquatic areas. The refinery expansion and production and export of xylene poses a significant threat to my community of Anacortes, our climate, the Salish Sea and the surrounding communities. It seems clear that the only benefit would be to the Corporate Bottom Line.To me, there is no doubt that this project should not be permitted as proposed.	Thank you for your comment.
Other-0467	Christine Leonard	The manufacturing of Xylene, and increased overall petroleum production = more transportation by tankers and rail = Increased Air pollution,The greater chance of catastrophic accident that would forever change our areas livability, our environmental habitat.	Thank you for your comment.
Other-0468	Victoria Young	No no no!! Seven generations from now we will be held accountable for our actions today! No no no!!!!	Thank you for your comment.
Other-0469	Ed Gastellum	If employee safety does not garner the absolute in safety evaluation, then the long term significant impacts to the surrounding community and water environment are suspect in this draft EIS.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0470	Nancy Farr	I feel strongly that Tesoro should NOT be allowed to produce and/or ship Xylenes from its Anacortes facility. Such expansion of their business would be dangerous to Washington's cities, waters and wildlife.	Thank you for your comment.
Other-0471	Jesse Straight	No!! We should be trying to improve our environment, not making it worse! Too big of a chance for a spill. We need to drive cars that use clean energy!	Thank you for your comment.
Other-0472	Chantal Bussiere	I feel that the expansion product has been planned with only short-term financial interests in mind. I am asking that an in-depth and unbiased review of the potential environmental and ecological impacts be conducted, and please keep in mind that oil is a temporary and rapidly dwindling source of income.	Thank you for your comment.
Other-0473	Court Olson	I'm writing to request your denial of a permit for the Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Other-0474	Court Olson	I feel compelled to comment even though I live outside of Skagit County. It's up to all of us to advocate restraint and caution where ever the location of such damaging exploits raises the red flag of concern. Please do not through caution to the wind and approve this Tesoro expansion.	Thank you for your comment.
Other-0475	Margaret Kinsella	As a resident of Whatcom County and a frequent visitor to Anacortes and the San Juan Islands, I strongly urge you people at Tesoro who don't even live here to drop this xylene production project. I do not see how you can make it safe for us, our whales or our entire ecosystem. We will be at risk not only physically from complications but our economic foundation of tourism will be ruined. Please reconsider this toxic project.	Thank you for your comment.
Other-0476	Naomi Murphy	Please fully scrutinize this project, taking into consideration the negative impacts that toxic petrochemicals could have on our fragile environment. Emissions from processing xylene, to possible spills during shipments - disruption to our sea life caused by the	Thank you for your comment.

ID	Contact	Comment Text	Response
		increased tanker traffic - all of this is too risky to permit.	
Other-0477	Louise Dustrude	I wish to register my opposition to the Tesoro proposal to ship xylene and other substances through the waters of the San Juan Islands.	Thank you for your comment.
Other-0478	Helen Oxley	Please protect the extraordinary beauty and irreplaceable natural resources of the Pacific Northwest from exposure to pollution from the proposed expansion of the Tesoro Refinery. If we destroy these resources now, we won't get a second chance.	Thank you for your comment.
Other-0479	Joseph Mabel	The threats that the Tesoro Refinery's proposed expansion project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.	Thank you for your comment.
Other-0480	Eva-Maria von Bronk	Please don't protect manufacturers of xylene. It's a highly volatile, hazardous and noxious substance and transporting it on ships threatens your communities and the ocean.	Thank you for your comment.
Other-0481	Jane Brandt	I am opposed to the expansion of the Tesoro plant to produce xylene.	Thank you for your comment.
Other-0482	Jane Brandt	Short term gain for monetary gain at the expense of long term destruction of the environment should no longer be tolerated.	Thank you for your comment.
Other-0483	David Frome	Thank you for the opportunity to provide comment on the Tesoro Refinery's proposed expansion project. The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous and noxious substance. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.	Thank you for your comment.
Other-0484	David Frome	It is not acceptable to take these risks with our environment and the lives of generations to come	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0485	Glen Hendrick	So please please don't put this through and we really need an environmental impact statement on this. If you're if you're gonna try and do it because people out here need to know that it's not going to be a toxic disaster.	Thank you for your comment.
Other-0486	Kajsa Ingelsson	we dont need more oil!!!we need clean, green energy and investments. Not more of the same old, dangerous [stuff]. please stop this now.	Thank you for your comment.
Other-0487	Frances Ambrose	I commend the efforts to upgrade and build new equipment to create less pollution associated with fuel transfers and other refinery activities. I do not feel all the issues surrounding the production and transportation of Xylene have been adequately addressed and will need much more work before approval will be possible.	Thank you for your comment.
Other-0488	Richard Elam	This is very simple no Bla Bla Bla necessary. Big Corporate Oil sees a green light under Pres. Trump and his I don't care EPA director Scott Pruitt to do whatever they want to increase the personal wealth of Big Oil leaders across this country. They do not care one bit if your neck of the wood and water ways end up polluted from accidents, leaks or whatever. If an environmental disaster occurs Big Oil will quickly externalize all responsibility and costs to You, Local Government and Tax payers. There will be no help or environmental remediation from the EPA as they have already defunded all other similar projects. You and your community are the designated fall guys for Big Oil and they will be the ones who actually make the Millions not your community.	Thank you for your comment.
Other-0489	Anne Greene	I am concerned about the Tesoro Refinery's proposed expansion project to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance. The threats that this	Thank you for your comment.

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		project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.	
Other-0490	Anne Greene	Please ask that these issues be addressed and carefully weigh what we could lose in the Northwest if an accident did occur before granting permission for this expansion	Thank you for your comment.
Other-0491	Dana Mueller Keefe	<p>I oppose the extraction and shipment of xylene as proposed by the Tesoro Anacortes Refinery.</p> <p>I am aware of the permits required for production and shipping of xylene, and the environmental impact statements also required. Apparently the potential dangers are clear.</p>	Thank you for your comment.
Other-0492	Meg Dugan	<p>When will the act of putting our health, the health of wildlife and the health of our environment first be the rule rather than the exception?</p> <p>When will we learn that there is more to life than profits? When will oil companies admit that their product is toxic and we should do better because we know better.</p> <p>When?</p>	Thank you for your comment.
Other-0493	Rebecca Durr, Greg Durr	<p>The DEIS does not demonstrate that Tesoro's Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.</p> <p>Most of Washington residents enjoy our natural resources and beauty. We do not want our state to become a wasteland because petrochemical companies want to expand business here or use us as a thru-way and stopover to the manufacture and transportation of dangerous materials.</p>	Thank you for your comment.
Other-	Lea Andrade, Christian	We totally object to your wanting to transport such a toxic substance through our waters. When will you realize that putting	Thank you for your comment.

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0494	Andrade	profits over the environment will be hazardous to all living things. Where is your Heart?	
Other-0495	Alena Wheary	Please do not continue the production and export of xylenes.	Thank you for your comment.
Other-0496	Joline Betterndorf	The short-term tradeoffs for less sulfur in gasoline versus the dangers of reformate and xylene, and for increased profits for a corporation versus a few jobs, seems more of a risk than it is worth.	Thank you for your comment.
Other-0497	Esther Lultikhuizen	<p>For the ultimate benefit of gaining only twenty permanent jobs, let's PLEASE not be seduced into this project. In the public comment session for the environmental impact statement at the recent open house for CPUP, it was very clear the the only people who showed enthusiasm for this project, urging it forward, were Tesoro employees, outside vendors who would help build the facility, and the Chamber of Commerce representative. Everyone else whose concerns were about our natural environment and quality of live (air, water and light pollution).</p> <p>- I agree with the high school student who spoke out at the open house: Let's work to attract forward thinking, clean industries to Skagit County, no more refinery/chemical industry that pollutes the air and water of our singularly beautiful environment; emitting particles that pollute the soil of our farm land; disturbing our very special bird population with the astonishing glow coming from March Point and the oil tanker at night.</p> <p>Skagit County officials, please, let's not invest in dying industries that will be phased out in a decade or two. Take a stand, make us proud: Say NO to Tesoro Anacortes CPUP.</p>	Thank you for your comment.
Other-0498	Susan Crampton	the Tesoro proposal appears to be a wrong project in the wrong place.	Thank you for your comment.
Other-0499	Colin O Hermans	Laws are for protection of the people, as any fool can see, we don't need to tolerate more toxic industry in this area.	Thank you for your comment.

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Other-0500	Patricia Parcells	I believe that it is not in the best interest of our region or of our country to expand the fossil fuel infrastructure. We should be conserving this resource for highest use and diversifying our energy supply rather than concentrating on toxic fossils.	Thank you for your comment.
Other-0501	Deborah Alexzander	<p>IT IS TIME OUR GOVERNMENT STAND WITH AND FOR A CLEAN ENVIRONMENT FOR OUR NATION AND STOP SUPPORTING DIRTY FOSSIL FUELS POLLUTING OUR ENVIRONMENT JUST SO THEY CAN ADD MORE \$\$\$\$ TO THEIR BOTTOM LINE, WHICH IS ALREADY BLOATED!</p> <p>AS MORE AND MORE AMERICANS BEGIN TO REALIZE JUST HOW BAD OUR CURRENT POLITICAL FOLKS ARE WITH REGARDS TO THEIR CONTINUED SUPPORT OF ALL THINGS "BIG MONEY" AT THE EXPENSE OF PEOPLE, THEY, OUR CITIZENS WILL "WAKE UP" AND DEMAND CHANGES THAT PUT OUR PLANET/PEOPLE BEFORE BLOATED PROFITS!</p> <p>I LOOK FORWARD TO 2018 AND 2020 BUT UNTIL THEN I WILL CONTINUE TO SIGN/WRITE PETITIONS, MAKE CALLS AND MARCH/PROTEST IN THE STREETS AND I KNOW MORE AND MORE OF THE "SLEEPING GIANT OF THE 90% WILL BE JOINING ME.</p>	Thank you for your comment.
Other-0502	Liz Amsden	<p>The thought of Tesoro desecrating the sound appalls me. Tesoro i NOT a good neighbor and, so long as they put profit ahead of people, never will be.</p> <p>They lie, they cheat, their employees work in unsafe conditions. Xylene is toxic in production, toxic in storage and toxic in shipping.</p>	Thank you for your comment.
Other-0503	David Laws	This is a very bad idea. Do not allow this dangerous proposal to advance!	Thank you for your comment.
Other-0504	Sheila Maseda-Gille	Please say NO to this proposal for adding toxins to our Washington state air,waters and land. We do not need or want additional pollution to our beautiful state. If they must, let the oil industry enrich themselves someplace else.	Thank you for your comment.

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Other-0505	Donald Worley	This is another dangerous scheme placing profit above people- not to mention common sense.	Thank you for your comment.
Other-0506	Barbara Nelson	Please don't allow Tesoro to shortcut review processes and disregard the very real potential long-term impact to the Puget Sound region	Thank you for your comment.
Other-0507	Bonnie Spinazze	HAVE BEEN WRITING FOR DECADES TO PROTECT OUR PLANET SAD THAT CORPORATIONS AND PROFITS STILL REIGN SUPREME OVER THE NEEDS AND WHAT IS BEST FOR OUR PLANET AND IT'S CITIZENS LEADERSHIP TAKES COURAGE NO TO THESE CHEMICAL PLANTS !	Thank you for your comment.
Other-0508	Sara Fogan	Please, please do NOT allow this project to go forward. The negative consequences to the environment and the people and animals that live in this community are immeasurable.	Thank you for your comment.
Other-0509	John Cusano	Worse, investing in fossil fuels at this point is antithetical to our health, economic success, and environmental sustainability.	Thank you for your comment.
Other-0510	Jenny Kastner	Please stop committing ecocide!	Thank you for your comment.
Other-0511	Jean A Westler	We must stop sickening and killing ourselves with unnecessary pollution dangers.	Thank you for your comment.
Other-0512	Jean Perkins	The people of the area must be protected from these poisons being passed through this region.	Thank you for your comment.
Other-0513	Marya Roddis	The proliferation of pipelines and shipping of petroleum products overseas is indicative of the glut in the market. There is no need for further expansion from a responsible viewpoint. Our job as citizens, and yours at Skagit County PDS, is NOT to expand the profits of a corporation or corporations. Our job, and yours, is to protect our environment in balance with our needs. Our need for	Thank you for your comment.

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		petroleum is well met. Our need for environmental protections (water, air, land) is not being met and will not be met through expansion of the Tesoro Refinery.	
Other-0514	Adele Zimmermann	WE MUST STOP RISKING THE SAFETY OF OUR CITIZENS AND OUR ENVIRONMENT IN THE NAME OF CORPORATE PROFIT. MY VOTE FOR THE PROPOSED MANUFACTURE AND TRANSPORTATION OF A HIGHLY TOXIC SUBSTANCE IS NO, NO, NO!	Thank you for your comment.
Other-0515	Laurie Goodhart	No more pollution, carbon release, or potential disasters without referendum by the people of this planet	Thank you for your comment.
Other-0516	Josh Heffron	No Absolutely Not No Absolutely Not No Absolutely Not No Absolutely Not No Absolutely Not	Thank you for your comment.
Other-0517	Susan Hughes-Smith	I adore this region of the country, my friends and family draw me to the region regularly and I hope this project does not move forward.	Thank you for your comment.
Other-0518	Christina Irwin	As a resident of the Pacific Northwest I strongly support my fellow citizens in Washington on the beautiful and natural Olympic Peninsula in their quality of life which could be forever damaged by the construction of this Tesoro manufacturing plant for an extremely toxic, volatile and dangerous substance.	Thank you for your comment.
Other-0519	Christina Irwin	Please do not allow this to be built. Protect our Pacific Northwest and the Olympic Peninsula from a very dangerous poisonous plant.	Thank you for your comment.
Other-0520	Fraser Rasmussen	The transport of Xylene, a particularly toxic, and even carcinogenic petrochemical should be prohibited in this environmentally sensitive water way.	Thank you for your comment.
Other-0521	Jean Brodahl	I was alarmed to learn of the proposal for this expansion of the refinery in Anacortes. Please do not push this through.	Thank you for your comment.
Other-0522	Kelly McConnell	A large part of my Pacific Northwest heritage is based upon the pristine ecological treasure we have here and I will fight with	Thank you for your comment.

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		<p>everything I have to protect and preserve that treasure.</p> <p>I want CLEAN air and water, for me, for my children, and for all future generations. Risking either of those for the profits of a handful of greedy rich men who've never lived anywhere near here is obscene and VERY clearly NOT worth the risk. Would YOU risk YOUR home to ensure some far away rich mans out-sized profits continue to roll in? I didn't think so.</p>	
Other-0523	Marie Dixon	This is a dangerous proposal and Tesoro knows it.	Thank you for your comment.
Other-0524	Ted Wray	If this is too difficult for you, then just have the kindness to put sarin in our water; that is a more merciful death.	Thank you for your comment.
Other-0525	Robert Poignant	I EXPECT EXISTING FEDERAL ENVIRONMENTAL REGULATIONS THAT WOULD HAVE LIMITED SOME IMPACTS (BUT NOT ALL) ON AIR AND WATER QUALITY WILL NO LONGER BE AVAILABLE UNDER THE NEW TRUMP ADMINISTRATION. THIS IS AN ADDITIONAL REASON (IN ADDITION TO OTHERS STATED HERE) TO DENY PERMITTING OF THE PROPOSED PROJECT.	Thank you for your comment.
Other-0526	John Nelson	<p>Before I include the standard form letter, I want to say a few personal words about this topic -- and I hope this will be read by someone who can accept it as personally as it is written:</p> <p>I am a senior, an elder; and I am beginning to take seriously the weight of experience and knowledge that entails. One lesson I have learned through my long life -- painfully -- is that profit should serve beings, not the other way around. Please consider profit versus beings in your considerations!</p>	Thank you for your comment.
Other-0527	Charles Nafziger	The world need far fewer toxic chemicals, not more. We must stop the production and use of so many toxins if we want to survive as a species.	Thank you for your comment.
Other-0528	Lisa Misemer	Why it may be necessary to wean ourselves from Middle Eastern Oil, any measures should be done responsibly. The oil companies in the U.S. could be leading Green research and creating millions of	Thank you for your comment.

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		jobs from being a leader in the world.	
Other-0529	Julia McLaughlin	Profits over health, safety and a clean environment is deplorable and contemptuous.	Thank you for your comment.
Other-0530	Linda Maki	I live in King County but have spent many of my summers in Bellingham, the Deception Pass area and Oak Harbor and what happens to the air, land and water is important to me.	Thank you for your comment.
Other-0531	Brianna Kohlenberg	It is time to think of the environment and the people of Washington State...not Big Oil!	Thank you for your comment.
Other-0532	Caroline Kane	This would be so damaging to the environment. Please abandon these plans.	Thank you for your comment.
Other-0533	Katherine Jensen	I STRONGLY OPPOSE Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Other-0534	Chris Barnes	Please do not allow this plan to go forward	Thank you for your comment.
Other-0535	Chris Barnes	Thank you for your time and attention and please, please do what is necessary to protect and preserve the place where we are so blessed to live.	Thank you for your comment.
Other-0536	Deborah Rudnick	In a time when we should be leading on transitioning away from additional fossil fuel use, export, and risks to our threatened coastal waterways, this project proposes just the opposite. I encourage you to consider very seriously these significant risks.	Thank you for your comment.
Other-0537	Rick Harlan	Thank you for the opportunity to provide comment on the Tesoro Refinery's proposed expansion project. In a word, NO.	Thank you for your comment.
Other-0538	Julia Glover	This project poses multiple threats to our climate, the Salish Sea and the surrounding community -- it is VERY clear that this project	Thank you for your comment.

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		should not be permitted as proposed! Let's be real, folks!	
Other-0539	Sheila Maseda-Gille	I am strongly opposed to our beautiful state of Washington being used to manufacture and transport toxic substances. These toxins are not wanted here. Let's keep Washington clean.	Thank you for your comment.
Other-0540	Dave Garfield	The DEIS does not demonstrate should not be permitted as proposed.	Thank you for your comment.
Other-0541	Dave Garfield	Keep your toxic Xylene the Hell AWAY from our water and our children!	Thank you for your comment.
Other-0542	Cheryl Dykstra	Please do not do it. Please seek ways to profit from clean, renewable products instead.	Thank you for your comment.
Other-0543	Isabel Delatorre-Hansen	If your own children were threatened by this, would you approve it? Please set up safeguards now.	Thank you for your comment.
Other-0544	James Hipp	It makes no sense and provides no benefits other than short term profits for Tesoro.	Thank you for your comment.
Other-0545	Madison Cheek	This issue matters very much to me as I think it has huge potential to negatively impact the local environmental and people that rely on it.	Thank you for your comment.
Other-0546	Gayla Shoemake	I am writing to oppose the Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Other-0547	Gayla Shoemake	Because this project proposes to send toxic materials to our air, the Salish Sea, and towns around, it must not be permitted.	Thank you for your comment.
Other-0548	Paula Libes Chester	I am writing to register my disapproval of the Tesoro Refinery's proposed expansion project.	Thank you for your comment.
Other-0549	Kerry Koski	Even though I know there's need for more jobs in this area I think we can do better with cleaner jobs for more sustainable future.	Thank you for your comment.

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Other-0550	Valerie Krull	I do not support the production of xylene at the Tesoro Refinery. It is my strong belief that the most important job of local planners and leaders is to support the health and welfare of people and the environment. That can not be achieved through the addition of even more toxic chemicals to the stressful stew we are, and our land and waters are, already contending with. Please listen carefully to the recommendations of the people who have made it their life work to protect and defend human and environmental safety, and not the people who's primary objective is to turn a profit.	Thank you for your comment.
Other-0551	Carolyn Barney, Lyndon Greene	For all these reasons, we hope you will deny Tesoro's request to build a Xylene facility in Skagit County.	Thank you for your comment.
Other-0552	Mark Tanis	...DOES OUR WORLD REALLY NEED MORE CHEMICALS, MORE PETRO POLLUTION, MORE RISK?? ARE stockholder's returns really worth is?	Thank you for your comment.
Other-0553	Carol Sullivan	I oppose the proposed expansion of the Tesoro Oil Company's refinery near Anacortes.	Thank you for your comment.
Other-0554	Carol Sullivan	Protect what we have - don't spoil it for our children and grandchildren.	Thank you for your comment.
Other-0555	Gay Wilmerding	Increase safety margins for all in changing climate; increase profit margin with long-term thinking, not short-term return.	Thank you for your comment.
Other-0556	Joe Bucek	I have other concerns including orca whale and climate change impact, but my strongest are those listed above. I urge the EIS be deepened and strengthened to assure safety and health--of our people, our water, our climate, our natural world--should this project move forward.	Thank you for your comment.
Other-0557	Renee DeMartin	This is such a bad idea that the project should not be permitted at all.	Thank you for your comment.

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Other-0558	Allison Ostrer	I'm a citizen, voter, taxpayer and small business owner in Washington State and I OPPOSE Tesoro's plan to produce xylene.	Thank you for your comment.
Other-0559	Mark D Blitzer	I hope you will take into account the wishes of all of Skagit county's residents (and yes, the many visitors who recreate in the county), not just those of Tesoro	Thank you for your comment.
Other-0560	Roger Imes	We can live without more xylene so why risk despoiling such a beautiful enviroment? It makes no sense at all.	Thank you for your comment.
Other-0561	Cynthia Cannon	We frequently visit Anacortes, the Skagit Valley, and environs - this project threatens a region dear to me and my family.	Thank you for your comment.
Other-0562	Korinne Bricker	It is up to you and the rest of the people living on this planet at this moment to do everything in our powers to protect and preserve what we have left. Please think about the future of humanity and of Planet Earth. We are so fortunate to have evolved to harness the technology that we currently possess so lets use it for good.	Thank you for your comment.
Other-0563	Meg Chadsey	I simply urge you to act on these 5 recommendations for the long-term health of YOUR community as well as the Salish Sea. Any new development of this facility should be undertaken with the most stringent human and environmental protection measures in place-anything less risks too much.	Thank you for your comment.
Other-0564	Joy Grate	This is far too important to ignore.	Thank you for your comment.
Other-0565	Ken Kaliher	LET ME BEGIN WITH A PLEA TO PLAN OUR REGION'S FUTURE KEEPING IN MIND OUR NEIGHBORS' HEALTH AND WELFARE, OUR AIR, OUR WATER, OUR ENVIRONMENT, THE ABUNDANCE OF NATURE WITH WHICH THE PACIFIC NW IS BLESSED, AND YES, OUR ECONOMY. PLEASE DO NOT YIELD DOMINATION OF SKAGIT COUNTY'S ECONOMY TO CORPORATE INTERESTS WHICH ARE COMPELLED TO SEEK ONLY PROFIT, NOT PUBLIC WELFARE. PLEASE THINK LIKE THE FIRST NATION PEOPLES WHO HAVE LIVED ON THESE LANDS FOR MILLENNIA, AND LOOK AHEAD TO THE NEXT	Thank you for your comment.

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		SEVEN GENERATIONS, NOT JUST TO THE NEXT PROFIT AND LOSS STATEMENT, OR THE NEXT TAX PAYMENT. THANK YOU. NOW, PLEASE READ ON....	
Other-0566	Margaret LovellFord	Think seven generations in the future.	Thank you for your comment.
Other-0567	Randall Potts	We need forward looking solutions that are sustainable and not toxic. We should not take a step backwards by allowing this kind of development that will not meet our ongoing needs and foul our waterways and air.	Thank you for your comment.
Other-0568	Lois Danks	I am totally opposed to producing and exporting xylene. Especially when it is mainly for export, endangering sea life and harming the world environment in the long run by making plastics that are not biodegradable.	Thank you for your comment.
Other-0569	Joe Chasse	A NO on this xylene fiasco please!	Thank you for your comment.
Other-0570	Celia Kerr	Please prioritize the safety and health of our waters, air and land as you consider this project!	Thank you for your comment.
Other-0571	Rachel Molloy	Please oppose this project and deny the permit.	Thank you for your comment.
Other-0572	Marilyn Boyd	This is one more project with too many environmental hazards to people, wildlife and the Salish Sea.	Thank you for your comment.
Other-0573	Erin Baker	Please oppose this project and deny the permit.	Thank you for your comment.
Other-0574	Jared Howe	Please oppose this project and deny the permit.	Thank you for your comment.
Other-	Jerome Whitaker	I believe that the introduction of greater refinery capacity is a	Thank you for your comment.

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0575		mistake.	
Other-0576	Sara Bhakti	Protecting the environment is my top priority. The fossil fuel industry's practices threaten our environment in many ways. Transporting fossil fuels so that they can be burned elsewhere adds to our environmental problems.	Thank you for your comment.
Other-0577	Marisa McConaughy	As a resident of Whatcom County, I am deeply concerned that the proposed Tesoro Anacortes CPU Project threatens our climate, public health, and the sensitive Salish Sea ecosystem.	Thank you for your comment.
Other-0578	Jessica Broghan	These are MY thoughts as well as those of the majority of this county and Puget Sound area. We don't want our environment placed in additional jeopardy by destruction from refinery industry. I truly hope you give major consideration and respect to our desires and opinions.	Thank you for your comment.
Other-0579	Jaye Anna Mundy	Please remember that every day IS earth day and locally IS globally.	Thank you for your comment.
Other-0580	Mary Hanson	Please do the right thing.	Thank you for your comment.
Other-0581	Dirk Vermeeren	Do you really want to risk the local environment and quality of life we as stakeholders have preserved for additional monetary gains to the corporate shareholders of Tesoro?	Thank you for your comment.
Other-0582	Kathie Aberman	And beyond all this: look at the condition of our planet. Why would we go out of our way to produce MORE toxins???	Thank you for your comment.
Other-0583	Amy Morrison	It is time to end this assault on our environment and our health. Our children and future generations are relying on us to pivot away from this madness and choose a sustainable path forward, paved with a just transition to a green economy.	Thank you for your comment.
Other-0584	Catherine Muller	YOU have the authority to provide intelligent direction on these issues - we, the people do NOT. Fossil fuel industry is OLD	Thank you for your comment.

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		technology that is destructive to our planet and lives. All efforts need to be directed to new sustainable clean energy systems.	
Other-0585	Catherine Muller	Please STOP clinging to the old that just provides immense profits to a FEW - not benefits to everyone else. Is there ANY integrity and intelligence left anywhere in our government????	Thank you for your comment.
Other-0586	Barbara Sjöholm	I write to express my concern about the manufacture and export of xylene.	Thank you for your comment.
Other-0587	Tom Cole	The Salish Sea and the San Juans are precious. Xylene is not.	Thank you for your comment.
Other-0588	John Espe	The risk to the environment and employees is too great to allow this to be permitted.	Thank you for your comment.
Other-0589	Robin Gold	As a leader in clean and climate-friendly energy technologies, Washington state's values are directly at odds with the Tesoro Anacortes Refinery plans, which seek to manufacture and export the highly toxic and hazardous chemical xylene.	Thank you for your comment.
Other-0590	John Kus	We all know about Ivanka, but don't we have any more children we love more than MONEY? Remember they can't EAT, DRINK or BREATHE the MONEY!!! That seems to be all we are leaving them.	Thank you for your comment.
Other-0591	David Parker	I oppose any efforts to expand the Anacortes refinery. Look at what's happening to coal. The same will happen to all fossil fuels, and the sooner the better. We need to be investing in decommissioning, detoxing, and reclaiming lands now sacrificed to a dying industry.	Thank you for your comment.
Other-0592	David Parker	Even if decommissioning and reclamation efforts started today, with no footdragging from Tesoro or whoever they sell it to evade responsibility, the best that land will ever be is a huge version of Gas Works Park: skeletons of industrial dinosaurs standing watch over land too polluted to disturb. Why make it any harder?	Thank you for your comment.

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Other-0593	Karen Powers	Please, no xylene in the Salish Sea please,	Thank you for your comment.
Other-0594	Signature illegible, Gretchen Allison, Pam Coffey, Liza Michaelson, Lisa Nash Lawrence, Eric Ray, Daniel Tucker, Shann Westa	Skagit County - Protect our Water! No to Xylene Keep the Salish Sea free from xylene! ... ixnay on the ylene-xay!	Thank you for your comment.
Other-0595	Signature illegible, Gretchen Allison, Pam Coffey, Liza Michaelson, Lisa Nash Lawrence, Eric Ray, Daniel Tucker, Shann Westa	DO NOT SHIP XYLENE IN OUT WATERS - THE WORLD DOES NOT NEED MORE XYLENE. ... How can we think that adding another danger to our waters is a good idea?!? No Xylene!	Thank you for your comment.
Other-0596	Signature illegible, Gretchen Allison, Pam Coffey, Liza Michaelson, Lisa Nash Lawrence, Eric Ray, Daniel Tucker, Shann Westa	No chemicals in the Salish Sea Please. ... JUST BECAUSE WE CAN DOEST NOT MEAN WE SHOULD NO CHEMICAL TRANSPORT! if you can't see what's wrong here - think of your grandchildren Are you CRAZY! This is nuts. Stop this nonsense. ... Keep our home Sea Free of excess noise and chemicals!! ... Before you know it, you will destroy all that is sacred	Thank you for your comment.
Other-0597	Lori Erbs	I strongly oppose the proposed expansion of the Tesoro refinery in Anacortes.	Thank you for your comment.
Other-0598	J J Lindsey	I frankly wouldn't care if [the DEIS] DID demonstrate good preparation [by Tesoro to safely manufacture and export xylene].....the threats that this project poses to our climate, the Salish Sea, and native and surrounding communities make it clear that this project should NOT be permitted as proposed.	Thank you for your comment.

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Other-0599	J J Lindsey	<p>I do not want this expansion, whatsoever. I think it's insane to be transporting such toxic substances in a fragile ecosystem.</p> <p>But I am trying to outline what the absolute MINIMUMS needing to be met, would be....for the safety of our water, wildlife and human communities.</p>	Thank you for your comment.
Other-0600	Peggy Printz	Do not permit this project to continue as proposed.	Thank you for your comment.
Other-0601	Kristin Fetters-Walp	deny Tesoro's proposed expansion	Thank you for your comment.
Other-0602	Liisa Wale	I ... am writing to you to speak up against a the upgrade expansion to produce and export xylene at Tesoro Plant in Anacortes at March point.	Thank you for your comment.
Other-0603	Lael White	I oppose expansion of operations exporting xylene at the Tesoro Anacortes Refinery.	Thank you for your comment.
Other-0604	Deborah Martyn	Hello, I wish to make my concern and opinion known as to the proposed export of Xylene through the Anacortes port. NO NO NO NO, Please NO. ... This proposal benefits a select few in corporate interest and is a high risk for everyone, human and other than human....Respectfully, I say this is a bad idea, with high risk We should be phasing out the production and use of petroleum based products on this planet.	Thank you for your comment.
Other-0605	Lorraine D Johnson	Please do not confirm this until changed for the good of our state.	Thank you for your comment.
Other-0606	Roger Robinson	I am against the Tesoro Xylene plant proposal.	Thank you for your comment.
Other-0607	Kenneth Crawbuck	This is a time when environmental impacts are very clear -- if we persist in 'taking it out of the ground' we will accelerate our own demise as a species. If you think that this is not possible, then I	Thank you for your comment.

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		encourage you to read "collapse" by Jared Diamond where he shows that our species has already killed itself off many times because it destroyed the environment around it - we are now faced with a global crisis because of our 'blind spot' to environmental impacts. Please recommend a very detailed EIS that encompasses these concerns and those below	
Other-0608	Jess Wallach	We can and should do better [than xylene] in Washington State.	Thank you for your comment.
Other-0609	Joan Cole	As a citizen of the North Olympic Peninsula, I am terribly concerned about this latest proposed assault to our environment and lives. The following issues [form 6] are the most jarring to me in terms of the DEIS submitted to Skagit County by Tesoro. Do not allow he corporate/financial pressures contribute to the destruction of the Salish Sea that belongs to all of us.	Thank you for your comment.
Other-0610	Erin Kilpatrick	I do not believe the Tesoro Corporation—headquartered in Texas and led by a lifetime oil executive who has earned over \$85 million in compensation—cares much about our sound, wildlife, or even local communities. Risking a disaster at sea or on land to provide petrochemical materials for Chinese manufacturing is a proposal with high return for very few local beneficiaries. The refinery employs 350 people. Does this proposal create enough local jobs and wealth to justify the risks? This is a bad deal for Washington and doesn't reflect our traditional or growing business sectors. Reject it!	Thank you for your comment.
Other-0611	Gunnel Clark	The Tesoro Anacortes Xylene Proposal should be dead in the water.	Thank you for your comment.
Other-0612	Karla Sabin	I strenuously object to Tesoro's proposed Xylene project.	Thank you for your comment.
Other-0613	Nina LeBaron	PLEASE LOOK AT THE FACTS AND REJECT THIS APPLICATION.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0614	Nina LeBaron	PROTECT CLEAN WATER! PROTECT OUR ENVIRONMENT IF YOU EVEN CARE! PROTECT OUR ORCAS! PROTECT OUR STARFISH! PROTECT OUR SALMON! PROTECT OUR HEALTH!	Thank you for your comment.
Other-0615	Margaret Petkiewicz	We do all we can to support the health of SJI. WE oppose this refinery to the core of our beings; and will work to stop it.	Thank you for your comment.
Other-0616	Harry W Crosby	The worldwide environment of our times is being polluted by destructive human actions such as this and it is crucial that the broader human community organize rules and regulations to prevent such destructive activities by businessmen unconcerned with the world of our futures.	Thank you for your comment.
Other-0617	John S Sonin	My children's future will not be able to stand on the verity of sexes in all organics after your chemicals make hermaphrodites of everything animate!	Thank you for your comment.
Other-0618	Priscilla Martinez	We need to take better care of what is left of our environment.	Thank you for your comment.
Other-0619	Robert Cassinelli	What is the value of that which you wish your children and grandchildren to inherit of this Earth? Priceless? If this is your view for your children and grandchildren, then make sure this proposal is future safe.	Thank you for your comment.
Other-0620	Sean Mooney	If you can't guarantee all of the above [requests from Form 11], shut it down.	Thank you for your comment.
Other-0621	Shirley Lucas	Tesoro's prosperity threatens the safety of my children, my chosen habitat, and the ecological systems in Puget Sound. Tesoros's traffic must not be allowed.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0622	Steven Horneffer	I oppose expansion of this industry which has proven itself incapable of or unwilling to protect the environment from harm, over and over for many decades.	Thank you for your comment.
Other-0623	Susan Allen	There shouldn't even be a refinery operating there, hauling toxic petrochemicals through the area to begin with. Wake up before it's too late!	Thank you for your comment.
Other-0624	Tracy Griswold	In New York state, we face the same dangerous build-out of fossil fuel infrastructure all to construct the petrochemical highway that will support an export business not energy self sufficiency. At any rate, fossil fuels will be priced out of the world energy markets by renewables within the next 10 - 15 years, so all this infrastructure becomes redundant. It is a fool's errand to support fossil fuel priorities, financially and environmentally.	Thank you for your comment.
Other-0625	Lilith Rogers	This is a terrible idea.	Thank you for your comment.
Other-0626	Laura Goldberg	We must keep fossil fuels in the ground, and focus instead on CLEAN GREEN ENERGY!!!!	Thank you for your comment.
Other-0627	Clive Riseam	Why do we have to battle so hard to prevent the BIG OIL and MONEY every time they want to implement new strategies which endanger the unique fauna and flora of the region in question. We only have ONE environment we all have to live in, so the senseless risks associated with these toxins and petrochemicals CANNOT ever be justified.	Thank you for your comment.
Other-0628	Meg Seltzer	YOU HAVE THE POWER, PLEASE HELP.	Thank you for your comment.
Other-0629	David Link, Susan Link	WE HAVE TWO SETS OF FAMILY WHO LIVE IN ANACORTES AND WILL BE DEVASTATED BY THIS MAJOR INCREASE EXPORTING VOLATILE DEATH! YOU SHOULD BE REDUCING YOUR IMPACT ON THIS PLANET, RATHER THAN INCREASING IT. ANYONE WHO IS ON THE BOARD OF TESORO SHOULD BE REQUIRED TO LIVE FULL-TIME	Thank you for your comment.

ID	Contact	Comment Text	Response
		ON THE GROUNDS OF THIS REFINERY, ALL YEAR LONG! SEE HOW YOU LIKE LIVING EACH DAY, UNSURE WHETHER THERE WILL BE ANOTHER ONE TOMORROW!	
Other-0630	James Klein	This, like numerous other issues (climate change, food labeling, gun regulation, immigration reform, prison reform, education reform, short-term lending regulation, healthcare reform, banking regulation) remains a vexing problem primarily due to corporations' ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. The moneyed interests will turn any reform to their benefit, often at the expense of the nation as a whole.	Thank you for your comment.
Other-0631	Jef Harvey	I keep hearing that we need to expand fossil fuel extraction, no matter how dangerous it might be to our world, in order achieve energy "independence." How many export terminals do we need in order for that to happen? It seems to me that energy independence would mean closing all export terminals, and moving as quickly as we can to make fossil fuels as obsolete as possible.	Thank you for your comment.
Other-0632	Jill Andrick	We MUST get off fossil fuels before our entire planet is polluted!	Thank you for your comment.
Other-0633	Peter Paget	I ask you to say NO, a thousand times NO to this proposal.	Thank you for your comment.
Other-	Pamela Kjono	Once a pristine habitat becomes a business playground, it will never be the same. It can't be returned to the way it was. Not on	Thank you for your comment.

ID	Contact	Comment Text	Response
0634		any of our iifetimes.	
Other-0635	Michael Mitchell	Please don't let profit blind you to the harm you risk doing to the environment.	Thank you for your comment.
Other-0636	Maxine Goodyear	PLEASE. We have to start conserving Now to save our plant.	Thank you for your comment.
Other-0637	Linda Lindquist	We do not want or need these chemicals near our beaches, towns, food sources and wildlife.	Thank you for your comment.
Other-0638	Kaseem Booker	Stop spending money on politicians and start spending it on infrastructure then you guys would be actually doing something until then stop complaining so ... much and actually put your ... money where your mouth Is you guys are just as bad ad conservative at least they ...fight and pay for what they believe in . Don't send me another email take my name off your last because I'm doing my part and ...no... democrat or Republican has did anything to help me or people who look like me.	Thank you for your comment.
Other-0639	Joan Bregger	More threats to the environment will break my heart.	Thank you for your comment.
Other-0640	Jim Coots	In addition, as a resident of California, I remember well the efforts by tesoro to undermine our state's environmental protections. This is a greedy, screw-the-people company that has only its profits in mind. Please stop [them].	Thank you for your comment.
Other-0641	Gary Cook	Is is not enough that the chemical industry has destroyed much of Louisiana and New Jersey, let along much of China? This is a beautiful area which needs to be protected.	Thank you for your comment.
Other-0642	Erline Towner	There is no way Tesoro can stop the pollution that comes with this type of project. They are only interested in their own gain. It is up to you to recognize this request for what threats this project poses to our climate, the Salish Sea and the	Thank you for your comment.

ID	Contact	Comment Text	Response
		surrounding community make it clear that this project should not be permitted as proposed.	
Other-0643	Elizabeth Deutscher	Please help us take another step towards a cleaner safer future and help us spread this vision.	Thank you for your comment.
Other-0644	Dana Stewart	We appreciate your every effort to prevent inevitable damage and lethal contamination.	Thank you for your comment.
Other-0645	Cherie Scott	We have to protect our environment from the hazardous chemicals Tesoro generates. Expansion pf this facility and all it's activities will only invite harm to the surrounding environment and beyond!	Thank you for your comment.
Other-0646	Brian Flaherty	And, when wildlife is harmed and either sickens or dies, it cannot be replaced!!!!	Thank you for your comment.
Other-0647	Billie Abbott	Remember, if you won't police yourselves, we will!	Thank you for your comment.
Other-0648	Andrea Allen	As a nation, we must more toward renewable energy resources so as not to endanger more of the natural resources of which we are the only stewards.	Thank you for your comment.
Other-0649	Leda Zimmerman	I am extremely concerned about this proposed expansion. As someone who lives in a state with a fragile coastline and busy harbors, I've seen the impact of polluting accidents.	Thank you for your comment.
Other-0650	Janice Hutchinson	I hope you will carefully consider the risks to the environment and human safety on an equal footing with the desire of Tessoro.	Thank you for your comment.
Other-0651	Lesli Dalaba	The threats that this project poses to endangered salmon and orcas in the Salish Sea, threats to the local ecosystem, public health and community enjoyment of natural resources, make it clear that this project should not be permitted as proposed.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0652	Nicholas Pierotti	STOP THIS DEFILEMENT	Thank you for your comment.
Other-0653	Overton Hallford	Please, stop the oil companies assault on our environment.	Thank you for your comment.
Other-0654	Courtney Daniels	Please use your power and influence to help protect our natural environment and its inhabitants.	Thank you for your comment.
Other-0655	Alice Welchert	People before profits. Earth and her oceans and air amd people are being fouled and abused. Please stop the Tesoro scheme	Thank you for your comment.
Other-0656	Lauren Ruiz	People and environment--health and future!--before profits!	Thank you for your comment.
Other-0657	Janet Monfredini	Our main responsibility is to protect our environment and our ecosystems. Everything is not to be exploited for financial gain. Please apply ethics and take the high road.	Thank you for your comment.
Other-0658	Joseph Breazeale	Now we must choose, planet or profit on old and dangerous resource exploitation. This is not meant to be glib or sophomoric. It is easy to ignore the dire need for moral involvement but we cannot continue watching catastrophe.	Thank you for your comment.
Other-0659	Dennis Miller	NO NO NO NO NO NO NO NO to pollution! Yes to wildlife and the environment!	Thank you for your comment.
Other-0660	D Sifuentes	NO damaging the environment and subjecting residents to hazardous disasters!!!	Thank you for your comment.
Other-0661	Josh Heffron	No Absolutley Not No Not Happening Absolutely Not No Not Happening	Thank you for your comment.
Other-0662	Linda Haney	Let's cut the crap and the Dance and talk about the BIG PICTURE. OUR PLANET BECOMING ONE BIG ... OIL SLICK. NOTHING ELSE IS MORE PERTINENT OR CRITICAL. STOP. CLEAN ENERGY IS WHAT WE	Thank you for your comment.

ID	Contact	Comment Text	Response
		ALL DESERVE AND NOT MORE OIL SPILLS. STOP WITH THE GREED AND STUPIDITY. THERE SHOULD BE A FUTURE TO ENJOY.	
Other-0663	Nancy Shimeall	I am appalled that this project is possible. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should NOT be permitted as proposed.	Thank you for your comment.
Other-0664	Nancy Shimeall	Once all of these [items listed in Form 11] are studied, it will be obvious that this project must NOT move forward. We must invest in green, renewable energy, and stop using fossil fuels. The future of our species depends on it.	Thank you for your comment.
Other-0665	Kerrin McCall	I am in complete opposition to adding additional barges and tankers carrying petrochemicals.	Thank you for your comment.
Other-0666	Michael Huber	I am a property owner in Anacortes and I 100% agree with the following message: [Form 11]	Thank you for your comment.
Other-0667	Steve Lochner	HAVE YOU EVER BEEN TO THIS BEAUTIFUL PART OF THE COUNTRY?? WHY PUT IT AT RISK!!!	Thank you for your comment.
Other-0668	Stan Hunter	Enough pollution, please!	Thank you for your comment.
Other-0669	Kirk Gardner	Big Oil is a dying industry and all resources should now be directed to supporting Green Energy, its logical replacement.	Thank you for your comment.
Other-0670	L Ship	As a citizen of this country and this planet, I demand a full review of the safety and necessity of this expansion.	Thank you for your comment.
Other-0671	Harry Crosby	The worldwide environment of our times is being polluted by destructive human actions such as this and it is crucial that the broader human community organize rules and regulations to prevent such destructive activities by businessmen unconcerned with the world of our futures.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0672	Will McGarvey	We won't need one or two of these refineries in the next few years and we don't need more pollution here. We need to invest in the infrastructure for electric cars.	Thank you for your comment.
Other-0673	Margaret Petkiewicz	WE oppose this refinery to the core of our beings; and will work to stop it.	Thank you for your comment.
Other-0674	Bruce Eng, Liza Eng	A full review of the impacts of this expansion needs to be done. Any potential risks to people or wildlife and the project should not be allowed to proceed.	Thank you for your comment.
Other-0675	June Picard	REPUBLICANS WILL BE REMEMBERED FOR THEIR ROLE IN THE DESTRUCTION OF THE ENVIRONMENT, FREE SPEECH, DEMOCRACY AND THE ELEVATION OF SELF CENTERED GREED.	Thank you for your comment.
Other-0676	Linda Nicholes	Transporting and burning dead stuff dead stuff for go-power is making less and less sense. The beautiful state of Washington should NOT become a petrochemical highway!	Thank you for your comment.
Other-0677	Carol Mone	I agree with the prepared statement that follows [Form 11] in total.	Thank you for your comment.
Other-0678	Judith Mitchell	<p>It is a grave disappointment to those of us who know how dangerous this project can be; it is a surprise to find such expansion even considered. The world (excepting the greedy petrochemical industry and its plutocratic Big Oil moguls) is very aware that the days of petroleum use are coming to an end.</p> <p>Frankly, it is embarrassing that this country lags so pitifully behind in wisdom and savvy. What we ought to be doing is putting our money and intent into a renewable energy industry, which is already booming in most other industrialized countries. I am ashamed. And no; I won't "go back where I came from," because I am a third-generation American citizen.</p>	Thank you for your comment.
Other-0679	Joy Marley	Anacortes has been on my short-list for a retirement home; that is largely because of the marine life and beauty of the area. I believe	Thank you for your comment.

ID	Contact	Comment Text	Response
		it is a serious mistake to put it at risk and also do not wish any further use pollution. The area where I now live has frequent air pollution warnings when there is an increase in traffic volume; please don't let Aracortes suffer that fate.	
Other-0680	Terrill Maguire	I FEEL THAT YOUR FUTURE, ALONG WITH THE FATE OF US ALL, RESTS IN THE BALANCE!	Thank you for your comment.
Other-0681	Christopher LoGiudice	STOP BEFORE IT IS TOO LATE. THIS IS A COMPLETELY INSANE IDEA... STOP BEFORE YOU KILL A BUNCH OF INNOCENT ANIMALS AND PEOPLE. PLEASE. BECAUSE ONCE THAT HAPPENS IT BECOMES UNFORGIVEABLE. DON'T YOU KNOW THAT?	Thank you for your comment.
Other-0682	Angela Lambert	It is quite frightening to think that the health of our environment is not the priority.	Thank you for your comment.
Other-0683	Joe Kotulic	I moved to the PNW to get away from big energy and the damage they do to our natural resources. Don't destroy the few natural places we have left.	Thank you for your comment.
Other-0684	James Knoble	I do not support any other part [elements beyond those require to comply with Clean Air Act requirements] of their proposal.	Thank you for your comment.
Other-0685	Karen Kennedy	As Canadian that has grown up on Vancouver Island, I see this not just as threat to US waters but home town.	Thank you for your comment.
Other-0686	Lily Johnson	Greed will never over-ride decency and actions to take care of the planet we all co-habit.	Thank you for your comment.
Other-0687	Lily Johnson	If we continue to take risks like this, we too will become an endangered species,unable to count on our earth to nurture us.	Thank you for your comment.
Other-0688	Shauna Haines	Without the above [Form 11] precautionary provisos this project should be dead in the water!	Thank you for your comment.
Other-	Jessica Gerdau	Please get that most Americans want green and clean alternatives to energy. I implore you other companies like you to change with	Thank you for your comment.

ID	Contact	Comment Text	Response
0689		the times.	
Other-0690	Sally Fisher	I know that is these times when we have stupidly allowed the likes of trump and Ryan to run over all of the basic principals that have made America great, in order to serve corporate hijackers & put big bucks in their own campaign pockets, it's not surprising that they would cave in to big oil ~ disgusting.	Thank you for your comment.
Other-0691	Richard Fairfield	DO YOU GUYS LIVE IN WASHINGTON? SERIOUSLY, YOU WANT TO DESTROY YOUR OWN HOME? DID YOU VOTE FOR STUPIDITY.	Thank you for your comment.
Other-0692	Monica Duclaud	I urge you to NOT permit this project as proposed.	Thank you for your comment.
Other-0693	Jeffrey DeCristofaro	please hurry to prevent further damage. We don't need the corrupt in power to destroy our environment any more than they already have!	Thank you for your comment.
Other-0694	David Councilman	TIME to get US off of petro-cheicals and other poisonous energy sources and work to save the future health of the world and all life....	Thank you for your comment.
Other-0695	May Cheung	Plans to protect air and water, wilderness and wildlife are in fact plans to protect man. - Stewart Udall	Thank you for your comment.
Other-0696	Elan Carlson	We are here to care for our world and all its life, not to destroy it to fund greed.	Thank you for your comment.
Other-0697	Anita Brandariz	I just don't understand why oil refineries are not being fazed out and green energy growing. Fossil fuel corporations must change and gear up to clean energy if we are to survive. Please use common sense and save our planet.	Thank you for your comment.
Other-0698	Mary Abramson	As the representative of ALL the people in WA you have a duty to PROTECT their safety. To allow these chemicals to be shipped is simply too risky.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0699	Gale Thomssen	We have a responsibility to this world we call home. Pollution of our waters and environment is a crime. Stop further destruction by denying more shipping.	Thank you for your comment.
Other-0700	Susan Marone	We do not need to expand but reduce .	Thank you for your comment.
Other-0701	Tim Dustrude	It's time to divest from fossil fuels and begin investing in green energies like solar and wind.	Thank you for your comment.
Other-0702	Pamela Osgood	The Tesoro's expansion project is far too dangerous to approve.	Thank you for your comment.
Other-0703	Paul Fellows	The comments below [Form 11] reflect carefully considered impacts of the Tesoro proposal to export xylene, a substance far more toxic than oil. The ecologic future of the Salish Sea biome is at stake and damage to it affects the general health of all creatures living in the area - including humans!	Thank you for your comment.
Other-0704	Tom Stark	I know it sounds prejudiced but I have no trust in the petrol "anything"industry. They screw the pooch every time we turn around and I have never seen them pay for their mistakes. It is always the taxpayers. With all the damned subsidies they receive, having to pay their cleanup bills is criminal. It is never a question of "if" there will be some catastrophe but rather when. If they are trying to locate where they haven't been or someplace that is vulnerable...keep them out!	Thank you for your comment.
Other-0705	Susan Foley	IT IS IMPERATIVE THAT WHAT LITTLE, YET PRECIOUS AND IRREPLACEABLE LIFE, BE SPARED. THINK FIRST, ACT NEXT, USE YOUR CONSCIENCE AS YOUR ONLY GUIDE.	Thank you for your comment.
Other-0706	Robert Neal	Stop this abomination of an environmental devastating plan NOW!	Thank you for your comment.
Other-	Marco Pardi	I view the greed driven reckless treatment of the environment as	Thank you for your comment.

ID	Contact	Comment Text	Response
0707		direct attacks on the lives of my daughter and grandchildren.	
Other-0708	Lara Post	Please protect orcas, salmon and the whole environment by preventing more tankers from coming through this area!	Thank you for your comment.
Other-0709	Joyce Wheaton	We need to preserve the flora and fauna we have left before there is nothing left for us to protect.	Thank you for your comment.
Other-0710	John Melcher	THE WHOLE IDEA OF THIS FLIES IN THE FACE OF THE WORLD-WIDE EFFORT TO WEAN OURSELVES FROM FOSSIL FUELS. IT IS SIMPLY WRONG!	Thank you for your comment.
Other-0711	John Furlong	When you live in the past you do not have a future. Support clean renewable energy and stop disregarding both human and animal needs for a clean environment	Thank you for your comment.
Other-0712	James Shepherd	Big oil can and should die.	Thank you for your comment.
Other-0713	Frances Goff	The kind of damage this enterprise would wreak on the entire Coast would put all who live near it in harm's way.	Thank you for your comment.
Other-0714	Diana Dee	This is ill-advised and bad for the rest of us.	Thank you for your comment.
Other-0715	D C	Don't pollute your mother earth	Thank you for your comment.
Other-0716	Cynthia Wilson	I am very concerned about this administration's plan for our environment, our wildlife, it's national parks and our valuable natural resources. Trump has barely been in the White House for 100 days and he already has undone much of the hard work administration's of the past have worked so vehemently to protect. Wake up Mr. Trump!!!	Thank you for your comment.
Other-	Cynthia Wilson	Protect our lands and all of our resources instead of sticking your head in the ground. What you decide to do in the next four years	Thank you for your comment.

ID	Contact	Comment Text	Response
0717		will impact this country for years to come. Save our resources, respect our wildlife, get outside and smell the roses before they are gone.	
Other-0718	Chris Wyeth	We need to be keeping fossil fuels in the ground, not mining and refining more. Stop this madness and help us keep this planet a liveable place. There is no place for short term profit any more.	Thank you for your comment.
Other-0719	Bobbi Segal	We have to stop letting the ARROGANCE OF GREED DESTROY THIS COUNTRY. ENOUGH IS ENOUGH. Thank you God for putting the breaks on those destroying this country with their GREED.	Thank you for your comment.
Other-0720	Bob Nace	Stop the sludge.	Thank you for your comment.
Other-0721	Betty Abadia	I hate to sound like a NIMBY, but not only Washington state, but the entire ocean is "my back yard," and we do not want further hazards and pollution in it!	Thank you for your comment.
Other-0722	Eleanor Smithwick	Please consider the environment and marine wildlife over industrial expansion.	Thank you for your comment.
Other-0723	Eleanor Smithwick	Please deny the expansion request of Tesoro's Anacortes Refinery on the coast of Washington State.	Thank you for your comment.
Other-0724	Harold Appleton	We really do not need to ramp up oil production in an era when alternative energy systems are rapidly growing and oil is becoming less of a necessity.	Thank you for your comment.
Other-0725	Lisa Dahill	Please do not expand the capacity of the Tesoro Refinery.	Thank you for your comment.
Other-0726	Lisa Dahill	I also find this project poorly thought out for other reasons.	Thank you for your comment.
Other-	Jen Fujii	We do not need to move forward with this proposal if it is not safe	Thank you for your comment.

ID	Contact	Comment Text	Response
0727		for us and for the planet.	
Other-0728	W Cariello	JUST HOW MANY SPECIES CAN MAN IMPACT BEFORE THE ENTIRE ECOSYSTEM (US INCLUDED) PAYS THE PRICE??	Thank you for your comment.
Other-0729	Marya Zlatnik	I'm deeply concerned about pollution impacting it's natural beauty.	Thank you for your comment.
Other-0730	Linda Carroll	I believe that when all of these provisions [Form 11] have been met, it will be clear that Tesoro's proposal is entirely inappropriate for Washington State waters.	Thank you for your comment.
Other-0731	Demian	This project poses threats to the: Climate, Salish Sea, and Surrounding Community.	Thank you for your comment.
Other-0732	Demian	This project should not be permitted as proposed.	Thank you for your comment.
Other-0733	George White	Please protect God's creation in the Pacific Northwest; not profits for Big Oil.	Thank you for your comment.
Other-0734	Joanne Watchie	The risk to our environment is too great to allow this refinery expansion!	Thank you for your comment.
Other-0735	Nancy Lightfoot	Fossil fuels are on their way out and are a direct threat to our climate, oceans, and air quality.	Thank you for your comment.
Other-0736	Nancy Lightfoot	Increasing the chances of oil spills in our waters to cater to a dying industry is foolish and self-destructive.	Thank you for your comment.
Other-0737	Dena Turner	We must act now to prevent further fossil fuel development. We must act to support the Paris climate commitment. Additionally, we must not at this time add further fossil fuel infrastructure	Thank you for your comment.

ID	Contact	Comment Text	Response
		which will lock us into continued climate change.	
Other-0738	Dena Turner	Do the right thing. Say no to climate change. Say no to decimation of our precious planet earth. Say no to Tesoro.	Thank you for your comment.
Other-0739	Corinne Salcedo	I don't think this project, as it is proposed, should be permitted.	Thank you for your comment.
Other-0740	Lisa Simmons	I see everyday the impacts human activities and industry have on a regional scale.	Thank you for your comment.
Other-0741	Shirley Ripullone	Washington State must not become another Louisiana as so intelligently reported in the book, "Strangers in Their Own Land: Anger and Mourning on the American Right" by Arlie Russell Hochschild.	Thank you for your comment.
Other-0742	Shirley Ripullone	Spills and leaks are certain to happen, and ineffective enforcement often occurs where money has influence. American's petroleum resources are not infinite and for the good of our national security and my grandchildren and their grandchildren, they should not be shipped out of the country, but rather preserved for future generations.	Thank you for your comment.
Other-0743	Jean Publieee	I am very much against shipping American energy out of America. we should keep our energy for ourselves. each time we drill for energy devastation, dirty air, dirty water, toxic to kill becomes part of our lives. its time to keep energy for americans only. this is just a rich mans ignoble disgusting profiteering scheme. shut it down.	Thank you for your comment.
Other-0744	Tom Nieland	Stop the insanity!	Thank you for your comment.
Other-0745	Carolyn Nieland	These areas [Salish Sea and surrounding community] are too vital and sensitive to risk!	Thank you for your comment.
Other-	Lori Morris	This us wrong for the Earth, her people and all forms of life!	Thank you for your comment.

ID	Contact	Comment Text	Response
0746			
Other-0747	Jane Keating	The children and grandchildren will know you were on the right side of history and will thank you for your work in stopping the expansion of harm to all of us. As a 5 th generation Northwesterner I thank you for the denial.	Thank you for your comment.
Other-0748	Jack Herbert	We know that corporations are driven to maximize profits, not serve the public good. That's why we need regulation to say no to their destructive designs. We know that extraction companies always try to extract more, regardless of harm to us and our planet. So, JUST SAY NO. ABSOLUTELY.	Thank you for your comment.
Other-0749	Drew Martin	I believe this project is bad for the environment.	Thank you for your comment.
Other-0750	Dennis Barnes	The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.	Thank you for your comment.
Other-0751	Nancy Lynch	This project should not be approved as proposed.	Thank you for your comment.
Other-0752	Jon Krueger	So in the short term, at least, this seems very misguided as an idea.	Thank you for your comment.
Other-0753	Mo Kafka	As a frequent tourist appreciating the natural beauty of your region I am very concerned.	Thank you for your comment.
Other-0754	J Jenkins	NO-NO-NO to the Tesoro Oil Company and their proposal...	Thank you for your comment.
Other-0755	Lisa Harmer	PLEASE STOP KILLING WHAT YOU CANNOT RECREATE...PLEASE DON'T DESTROY WHAT WE CAN NEVER REPLACE.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0756	Noreen Fujita-Sacco	I urge you to think globally and act locally now by considering the long term affects for the larger population in this EIS.	Thank you for your comment.
Other-0757	Noreen Fujita-Sacco	Protect our natural resources for future generations, limit projects that are dangerous, harmful to the environment, and unsustainable, keep our community safe by preventing new fossil fuel export projects.	Thank you for your comment.
Other-0758	Kevin Hughes	Will you help us as a society begin to look beyond the bottom line and see what's truly important? Our earth is being pushed to the breaking point on all fronts. This proposed expansion does nothing to elevate us as as species. Please prevent it!	Thank you for your comment.
Other-0759	Sue O'Donnell	It's getting closer and closer to the deadline for commenting on the Tesoro EIS. And I keep thinking of more reasons for you to resist this very dangerous plan to build an expanded facility on Tesoro site at March's Point, Anacortes WA to make & ship XYLENE out of the Port of Anacortes. THIS IS WHERE WE ALL LIVE!!!!	Thank you for your comment.
Other-0760	Maureen Cleveland	<p>I would also like to add that it is long overdue that we place life above profits. And we need to put the health of our communities, which does include animal and fish communities above industrial carbon needs and work harder to provide alternative sources of energy.</p> <p>We must not further endanger the land and waters that provide humanity with food on all levels. From the kelp and krill to the whale and the elk.</p>	Thank you for your comment.
Other-0761	Cindi Cagle	Keep this area as clean as possible for the best current viability of the area, to lessen pollution and for the future generations.	Thank you for your comment.
Other-0762	Lucy Schneid	Otherwise there should be no expansion. In a perfect world there would be no Tesoro Refinery at all.	Thank you for your comment.
Other-0763	Kathleen Stiles	I am very concerned about this project.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0764	Carol White	Please plan for planet earth and people. Air, water, safe food from ocean and land. Our future is in our hands. Stop this proposed project.	Thank you for your comment.
Other-0765	Chapman Clark	Do better.	Thank you for your comment.
Other-0766	Louise M Key	My husband ... and I are totally opposed to this possibility.	Thank you for your comment.
Other-0767	Louise M Key	It's sheer lunacy to allow Tesoro to produce a neurotoxin that could damage humans, air and water in our pristine area. There would be no way to put this Genie back in the bottle!	Thank you for your comment.
Other-0768	Louise M Key	PLEASE DO NOT ALLOW THIS FOR THE PROFIT OF A FEW!	Thank you for your comment.
Other-0769	Jade Scileppi	"If future generations are to remember us with gratitude rather than contempt, we must leave them more than the miracles of technology. We must leave them a glimpse of the world as it was in the beginning, not just after we got through with it." ? Lyndon B. Johnson	Thank you for your comment.
Other-0770	James Sorrells	Big Oil has corrupted our political system long enough. Money over all else is not the principle to pass on to the next generation. Instead let's pass along an environment they can be proud of and enjoy. "For in the true nature of things, if we rightly consider, every green tree is far more glorious than if it were made of gold and silver." --Martin Luther	Thank you for your comment.
Other-0771	Maxine Lautenberg	Although I do not live in Skagit County, your decision could very well influence decisions made on the east coast in relation to the Hudson River and ports along the coast.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0772	Alice Goss	Please protect our coast now and for our future. People and nature want safe water and clean air.	Thank you for your comment.
Other-0773	Brien Brennan	As a former resident of the Seattle are and frequent visitor to Bellingham, I'm keenly aware of the transformation this region has seen from a thriving community of life to a human-dominated state of depletion. The threats that this project poses to the region only exacerbates this widespread problem.	Thank you for your comment.
Other-0774	Brien Brennan	Plus it adds to the extreme climate crisis, and undermines the health of the Salish Sea and the surrounding community.	Thank you for your comment.
Other-0775	Naomi Bunis	Please do not approve this expansion!!!	Thank you for your comment.
Other-0776	Theodora Tsongas	We cannot continue to support the fossil fuel industry -- it puts us all in great peril.	Thank you for your comment.
Other-0777	Anita McInnis	his expansion needs a full review of the impact first and foremost.	Thank you for your comment.
Other-0778	Donna Murphy	We must keep dangerous fossil fuels in the ground.	Thank you for your comment.
Other-0779	Kasi Spyker-Duncan	In regards to the Tesoro Refinery's proposed expansion project, I remain concerned.	Thank you for your comment.
Other-0780	Mark Stidham	IT IS UNACCEPTABLE TO JEOPARDIZE OUR NATION'S MOST VALUABLE RESOURCES FOR THE BETTERMENT OF A PRIVATE INTEREST GROUP , WITH THE WORLD'S MOST TOXIC CHEMICALS! STOP.	Thank you for your comment.
Other-0781	Linda Baker	I agree 100% with the following statement: [Form 11]	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0782	Teresa McFarland	Please stop Tesoro Refinery's proposed expansion project. Not even one more vessel trip!	Thank you for your comment.
Other-0783	Alana Willroth	I dream of moving to Washington or Oregon when I retire. Please don't mess it up for me...	Thank you for your comment.
Other-0784	Susan Montacute	it's absolutely devastating to think that future generations may well be robbed of such serene beauty!!! Please take seriously the content of this message. We are watching your every move and DEMAND a full review of the impacts of your actions.	Thank you for your comment.
Other-0785	Gloria McClintock	This area of the Pacific Northwest is economically and environmentally complex and needs to be protected. Producing and shipping xylene would present too significant of a hazard.	Thank you for your comment.
Other-0786	Chris Wolfe	I oppose Tesoro's plans to expand production to include xylene.	Thank you for your comment.
Other-0787	Chris Wolfe	May this nature be around for 100s and 1000s of years, instead of pursuing short sighted policies for economic gain that could keep our children from not only enjoying, but living in the sound.	Thank you for your comment.
Other-0788	Liza Michaelson	I have some serious concerns, so I am glad you are inviting comment!	Thank you for your comment.
Other-0789	Liza Michaelson	Think of the big picture and protect our environment. Over the next decades this beautiful place will remain only if we take extra good care of it!	Thank you for your comment.
Other-0790	Susan Woods	I am opposed to the manufacture of xylene at Anacortes for several reasons.	Thank you for your comment.
Other-0791	Susan Woods	The Skagit Valley and all the places I have lived have their history of industry damage and little if any cleanup or people being taken care of from the damage. So, yes, producing xylene will be no different.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0792	Susan Woods	Please be a good neighbor and respect us.	Thank you for your comment.
Other-0793	Mully Mullally	I was horrified to learn of this proposal.	Thank you for your comment.
Other-0794	Mary Brady	We need to look at increased transportation of hazardous waste as a huge factor threatening our environment, our fragile Puget Sound and adding to looming disaster of climate change.	Thank you for your comment.
Other-0795	Mary Brady	My only question is why anyone would want to consider this [the increased transportation of hazardous waste] in exchange for profit and a small number of jobs?	Thank you for your comment.
Other-0796	Mary Brady	We need EIS to cover increased risk of toxic chemicals and the impact of increased oil tanker traffic.	<p>The Draft EIS discusses the potential impacts of the proposed project on human health and marine vessel traffic in the following sections:</p> <ul style="list-style-type: none"> • Human health – Sections 9.3.2, 9.6.2 • Marine vessel traffic – Section 13.3.2
Other-0797	Beverly Faxon	I am deeply concerned about the proposed Tesoro xylene plant.	Thank you for your comment.
Other-0798	Beverly Faxon	Unlike the industries of fisheries, tourism, shellfish harvesting and agriculture, the fossil fuel industry is simply not sustainable in the long term We should be investing and protecting those industries that have the potential to sustain the community in the future, not in an industry that is inevitably focused on short term gains.	Thank you for your comment.
Other-0799	Dena Jensen	As a resident of Whatcom County, I am deeply concerned that the proposed Tesoro Anacortes CPU Project threatens our climate, public health, and the sensitive Salish Sea ecosystem.	Thank you for your comment.
Other-0800	Tara Havard	Around here, Tesoro impacts almost every single person in our community; whether through a family member, friend or employer who does business with the refinery. The positive contributions	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>Tesoro has made in our community are visible throughout the County. Over the last year, Tesoro invested over \$1 million in local clubs and organizations, such as the Boys and Girls Club, The Anacortes Family Center, Padilla Bay Foundation, Skagit DVSA and numerous local STEM education programs. Not to mention near and dear to my heart starting a program at the Tesoro Anacortes where every year we will send an employee through the Leadership Skagit Program. I was the first graduate for Tesoro in the class of 2016 and this tradition and the enormous impact we make in the community with our energy and passion shows Tesoro's commitment not only to employees but the local community we operate in. My Leadership Skagit team partnered with Growing Veterans to transform their Starbird Rd. Farm with a new greenhouse and ADA compliant grounds. Since then Growing Veterans has in turned helped many Veterans from Whatcom to King County because of this project that would have not happened without Tesoro supporting me through this program. This is only one example. Our employees are volunteer tutors at schools, little league baseball coaches and volunteer fireman and medics. This is the caliber of people that work out here at the Tesoro Anacortes Refinery. We are proud. We have the deepest respect for our roots, the environment, and the community we work and live in.</p>	
Other-0801	Tara Havard	<p>As I mentioned in my last letter my support for the Tesoro Anacortes Clean Products Upgrade Project as a long standing employee of 17 years here in Anacortes and as a proud born and raised Alaskan, where my Grandparents worked at Alyeska Pipeline during construction and through retirement along with many family members, I thought I would share this speech with you by President Gerald R. Ford. This is an example of ecology and industry working together for the greater good. Not only will our project lower emissions through reduction in greenhouse gases, But the positive financial impact to the local and state economy by creating new jobs and employing hundreds of local seasonal contractors through the construction phase.</p> <p>This refinery has been " going strong since 1955" because the employees out here care and we hope to continue the legacy of the employees and contractors that built this refinery in 1954 and</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>carry on by being a leading example of energy and ecology co-existing.</p> <p>November 29, 1975 a speech from President Gerald R. Ford as he arrived in Fairbanks, Alaska at Eielson AFB.</p> <p>[quote of Gerald Ford's speech]</p>	
Other-0802	Jim Duffy	I just got you project papers in the mail today and I want you to know that I'm 100 percent behind what you're trying to do. Good for you guys. I hope it works out for you.	Thank you for your comment.
Other-0803	Josh Beaner	Great job! This is a very exciting opportunity for our town and county!	Thank you for your comment.
Other-0804	Landis Lutton	We cannot allow people outside of our community decide this community's fate. We have to take charge in the future, if this does not go through, and we give up all the positive benefits others will.	Thank you for your comment.
Other-0805	Terry Brazas	I am proud to support this project and to assist a company that takes care of its employees and the local environment.	Thank you for your comment.
Other-0806	Steve Berentson	I am impressed by the company's investment in upgrades that will contribute to protection of the environment. After review of Skagit County's Draft Environmental Impact Statement (DEIS) for Tesoro's proposed Clean Products Upgrade Project (CPUP), I am writing to express my enthusiastic support for the project.	Thank you for your comment.
Other-0807	Steve Berentson	I look forward to seeing this process move forward in favor of the project.	Thank you for your comment.
Other-0808	Sarah LaVoy	I am writing to express my support for Tesoro's Clean Products Upgrade Project (CPUP), and my enthusiasm for all of the benefits it will bring to Skagit county, like myself, and our community.	Thank you for your comment.
Other-0809	Sarah LaVoy	As a employee at the farmhouse restaurant, I am part of the catering department. As I have been catering , I have been able to	Thank you for your comment.

ID	Contact	Comment Text	Response
		be aware of this project. I believe it will bring greatness to our community.	
Other-0810	Sarah LaVoy	I look forward to seeing this process progress and I urge the county to approve the project.	Thank you for your comment.
Other-0811	Matthew Williams	I support Tesoro's Clean Products Upgrade Project. I am an employee at Tesoro's March Point refinery. I can speak to the commitment this company has to the local environment. This project follows suit with that commitment.	Thank you for your comment.
Other-0812	Matthew Williams	I am proud to support the CPUP project and work for a company that takes care of its employees and the environment.	Thank you for your comment.
Other-0813	David Corrion	I would like to endorse Tesoro's Clean Products Upgrade Project. As an employee of Tesoro, I know how committed Tesoro is to being a good neighbor of the community and the environment.	Thank you for your comment.
Other-0814	David Corrion	This is a great project that improves quality of life here and I would ask for support that leads to its approval.	Thank you for your comment.
Other-0815	Mark Burris	I support the proposed Tesoro Anacortes Clean Products Upgrade project.	Thank you for your comment.
Other-0816	David Anderson	I also greatly appreciate Tesoro's foundation support of local community programs. Programs that would not exist but for the commitment of organizations like Tesoro and Shell in our community. Programs like Boy's and Girls Club, Growing Veteran's, United Way of Skagit County, and the local chapter of American Red Cross.	Thank you for your comment.
Other-0817	Melissa Crezee	As an employee of Tesoro, and a resident of Anacortes, I am very proud of my company and all it does for me as an employee and our community. I am proud that Tesoro strives for the highest standards for personal safety and environmental stewardship, providing a vital service to our community and our country.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0818	Melissa Crezee	I would like to see Skagit County support the EIS and the permitting requests of Tesoro, with confidence that Tesoro cares about the environment and the people employed and living in the communities. Support of Tesoro ensures good paying jobs for the community, high valued product for the country, and the highest of environmental standards for the world.	Thank you for your comment.
Other-0819	Ryan Holewinski	I am writing this on behalf of Tesoro Anacortes Refinery, and for full disclosure, I am an employee with this company. I am quite familiar with this project, as I am currently part of the team trying to bring this together. I have been asked to assist with the training documentation that will be used for the NHT upgrade and Isom project, so I have been able to familiarize myself with the details of this endeavor. I understand that my words will be taken with a grain of salt, however, I firmly believe this upgrade will be beneficial not only for the company, but for the surrounding area; both economically and environmentally.	Thank you for your comment.
Other-0820	Greg Forney	My family and I support Tesoro Refinery with these projects and the safe environment we live and work in!	Thank you for your comment.
Other-0821	Rebecca Spurling	I am in full support of Tesoro's Clean Products Upgrade Project (CPUP).	Thank you for your comment.
Other-0822	Brett Powers	I am writing this letter to acknowledge my support for the Tesoro Clean Products Upgrade Project (CPUP).	Thank you for your comment.
Other-0823	Richard Johnson	<p>Broadening TESORO's product base helps a maintain a stable company in our community making our region more livable and secure.</p> <p>From my volunteer point of view TESORO has been very supportive of several programs I am involved with, The Anacortes High School Robotics Team 3238, A Simple Gesture-Anacortes and the Anacortes Family Center. TESORO support has been crucial making our Robotics program a world class program. A Simple Gesture-Anacortes is feeding folks and thanks to over 620 community food donors we have a well stocked food bank. A</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>TESORO grant helped get this program off the ground.</p> <p>Similarly the Anacortes Family Center has benefited as well.</p> <p>Concluding we need companies like TESORO and we all should be helping to make our community a wonderful place to live.</p>	
Other-0824	Russell Gibbs	<p>I am writing to express my support for Tesoro's Clean Products Upgrade Project (TCPUP), and my excitement for all of the benefits this project will bring to this community.</p> <p>I am encouraged by the positive benefits Tesoro does for our community and state. They impact almost every single person in this area whether through my many friends or my employer and its many employees and suppliers. The positive contributions Tesoro makes in the community are clearly visible.</p> <p>As you are aware they have invested well over a million dollars to local clubs and organizations which depend on their funds allowing them to continuing having a positive impact on this community.</p> <p>It is clear Tesoro desires to remain an active part of the community and will continues having a positive impact not only here but throughout our State.</p> <p>Looking forward to seeing this project move forward to completion and you have my full support of this project.</p>	Thank you for your comment.
Other-0825	Sarah Hammock	I support Tesoro's Clean Products Upgrade Project. I am an employee and see first-hand all the opportunities and benefits that Tesoro creates for our area. This proposed project represents the company's continued support and commitment in our community.	Thank you for your comment.
Other-0826	Sarah Hammock	I urge the county to approve the project.	Thank you for your comment.
Other-0827	Frank Salseina	Looking at the proposed project it is clear to see that the environment is being considered as the driving force. By reclaiming the sulfur, nitrogen and metals from the feedstock. This proposal looks like a necessity for improvement.	Thank you for your comment.

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Other-0828	Joe Wilson	<p>Pederson Bros., Inc. is a heavy industrial steel fabricator headquartered in Bellingham, WA with employees and subcontractors in Skagit County.</p> <p>The Tesoro Refinery in Anacortes affords our employees and subcontractors a very safe place to work along with also delivering to them good family wage jobs.</p> <p>We strongly advocate a quick approval for the requested permits by Tesoro for their upcoming projects.</p>	Thank you for your comment.
Other-0829	Arlan Kosters	I am a Pipefitter who works in the refineries and other sites that produce chemacals. Working at the refineries I know for a fact that the people and the companies are more protectant of the enviroment than people think!	Thank you for your comment.
Other-0830	Arlan Kosters	The people that work in these places are the same that use the water for recreation fishing,crabbing,clamming and just beach coming. The making of these products for reducing polution is a must to help the enviroment ! Reducing polution of our cars is very detrimental to our future and our kids future,these refineries and the people who run them are very intersted in protecting our enviroment and our futures!!	Thank you for your comment.
Other-0831	Ryan Holewinski	In summation, I know I am coming from a biased position, but my commitment to this area, and the enviroment, strongly out ranks my commitment to any company or corporation. I hope this comment will be regarded for what it is, an honest opinion from someone who has had the chance to really look at the data, and believes this is the correct course.	Thank you for your comment.
Other-0832	Susan E Ostrowski	My husband is proud to support this project and to work for a company that is willing to to invest in the future of our community.	Thank you for your comment.
Other-0833	David Wilson	I would like to express my support for Tesoro’s Clean Products Upgrade Project (CPUP).	Thank you for your comment.
Other-	Tara Havard	I am writing to express my support for Tesoro’s Clean Products	Thank you for your comment.

ID	Contact	Comment Text	Response
0834		Upgrade Project (CPUP), and my enthusiasm for all of the benefits it will bring to Tesoro employees, like myself, and our community.	
Other-0835	Bo Mason	<p>God Bless America!</p> <p>Get this, as long as there is demand this project it will be built. If not here, somewhere else, somewhere that has no Environmental Impact Studies. Somewhere that doesn't care what you think, and prefers that you don't. Somewhere that has Zero consideration for the environment and for the safety of the workers and the community.</p> <p>This industry, in this country and this state, are regulated and overseen like no where else. This is the best place for this project to be built, regulated and overseen.</p> <p>I am for this project being built at Tesoro Anacortes. To be truthful I have a huge stake in it. You see, I was born and raised here, and I am raising my family here.</p> <p>Thank you for the chance to speak up!</p>	Thank you for your comment.
Other-0836	Jeff Schwab	Lastly, Tesoro impacts our local community through Tesoro Community Investments which supports nonprofit organizations, emergency respondents, and environment conservation.	Thank you for your comment.
Other-0837	Frank Salseina	<p>To meet the environmental needs and continued inevitable growth, we need to advance in the way that best serves the needs of the people with minimal environmental impact of course. Simply stifling projects helps no one. Growth in a positive way considering the best options is difficult. In the end, employment, a more useable product and a cleaner environment would be the result. The refineries need to be constantly searching for ways to glean the best and safest products.</p>	Thank you for your comment.
Other-0838	Frank Salseina	<p>These aging plants should be allowed the opportunity to upgrade and take the most out of the products that they are processing. For us all to curtail growth would be great to a point, but it is here to stay and would be crippling if not managed properly. It is not likeable but is essential to attain a substantial life. For future and</p>	Thank you for your comment.

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		<p>established industries it is necessary to allow growth. Changes with all concerned groups and future groups also should be taken into consideration. I am in favor of allowing the Tesoro clean products upgrade based on my opinion and vision.</p>	
Other-0839	Karen McCallum	<p>Thank you for hearing my questions.</p> <p>I certainly respect Tesoro for it's long term support of workers and community.</p> <p>My granfather came to Anacortes from Texas as a forman for the Texaco Refinery when it was built on Marches Point.</p> <p>The company picnics and parties and contributions to Anacortes Community Theater and educational workshops for the schools bring fond memories to me.</p>	Thank you for your comment.
Other-0840	Dan Cameron	<p>I am writing to express my support for the Tesoro Clean Product Upgrade Project.</p>	Thank you for your comment.
Other-0841	Dan Cameron	<p>This type of improvement project in an industry that has been a cornerstone of commercial and community excellence for over 60 years in Skagit Valley does not happen every day and I am proud to voice my support for an industry that supplies a product that America needs for the foreseeable future versus importing these products from very competitive foreign refineries who would be glad to take our jobs and our crude oil and send us back the finished products.</p>	Thank you for your comment.
Other-0842	Larry Bishop	<p>There are sufficient protections and study to allow it to happen safely.</p> <p>Far safer long term than simply driving around Anacortes.</p>	Thank you for your comment.
Other-0843	John Huntley	<p>The (CPUP) project is a great project for the Tesoro Refinery and Skagit County.</p>	Thank you for your comment.
Other-0844	Keith Vanderbeek	<p>My family helped pioneer the Whidbey Island area around the turn of the century.</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>My great grandfather helped build the Deception Pass bridge with the help of the Civilian Conservation Corps during the depression. Following the depression, my family struggled with farming until the beginning of construction at the Shell Refinery where my great grandfather was employed until dairy farming began to become profitable.</p> <p>Some 50 years later, I was fortunate enough to be employed by the Tesoro Anacortes Refinery.</p> <p>My family has a very long history in this area, cherishes the environment AND the positive development and prosperity the refinery brings to our community.</p> <p>When speaking to people who do not understand our commitment to safety and the environment, it is very easy to educate them as to why this refinery is so crucial to the area. Our positive impact to the community is sometimes not so obvious and needs to be displayed, although I don't believe we strive for credit. We just want the same things everyone else wants...Clean air and water, a great place to raise our children and pass down what we've grown and built for the next generations. I believe that all of our projects support this philosophy and bring a very positive light to our community.</p> <p>I am very much in support of the CPUP.</p> <p>I greatly appreciate your time and thank you for listening,</p>	
Other-0845	Lynden Logistics, Jeanine St. John	<p>Lynden [Transport] is a multi-modal transportation and logistics company, with over 1,250 Washington employees, a history of scheduled service in the Pacific Northwest and Alaska, and extensive activity throughout the state of Washington, including support for all segments of the economy. Lynden [Transport] has provided transportation services for the resource industry including significant logistics support for Tesoro Refineries throughout the Tesoro system. Our company benefits both directly and indirectly from increased construction and development in the form of continued jobs and transportation services.</p> <p>We are writing to express Lynden [Transport]'s support for the</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>Tesoro Clean Products Upgrade Project DEIS. We have been working with the Tesoro team for many years providing logistics and transportation since the initial construction of the Anacortes refinery. Since the initial transportation until today, we have had a beneficial relationship with Tesoro, and we appreciate their contributions to the economics of Washington State and Puget Sound. They have help provide stable, well paying jobs and contracts with the support companies such as ours.</p> <p>Like Lynden [Transport], Tesoro has always strived to operate with a stringent safety and environmentally sound culture, which includes systems and procedures for safe operations, spill response, crew training, and environmental stewardship. We wholeheartedly support the continuation of Tesoro's refining operations, and likewise, the upgrade to the refinery using BACT to provide continued safety and economic development in the region.</p>	
Other-0846	Tom Decker	After review of the Tesoro Upgrade project DEIS, please consider my support for the upgrade project in light of the benefits it will provide in the region.	Thank you for your comment.
Other-0847	Tom Decker	Included in the project are some \$90 million in enhancements, putting the refinery on the path to better compliance with upcoming environmental regulation.	Thank you for your comment.
Other-0848	Bill Johansen	I'm with the Lynden companies. Lynden [Transport] is a multi-modal transportation logistics company with over 1,250 Washington employees, a history of scheduled service to the Pacific Northwest and Alaska. And it stems back to the [unintelligible] of Washington, including support of all segments of the economy. Lynden [Transport] has provided transportation services for the resource industry, including specific logistics to support Tesoro refineries throughout the Tesoro system. Our company benefits both directly and indirectly from increased construction and development, in the form of continued jobs and transportation services. We are writing to express Lynden [Transport]'s support for the Tesoro Clean Products Upgrade	Thank you for your comment.

ID	Contact	Comment Text	Response
		Project EIS. We have been working with the Tesoro team for many years, providing logistics and transportation support in the initial construction of the Anacortes refinery since the initial transportation till today	
Other-0849	Bill Johansen	Like Lynden [Transport], Tesoro has always strived to operate a stringent, safe, environmentally sound culture -- which includes systems and procedures for safe operations, spill response, crew training, and environmental stewardship. We wholeheartedly support the continuation of Tesoro's refinery operation and, likewise, the upgrade to the refinery BACT to provide continued safe and economic development in the region.	Thank you for your comment.
Other-0850	Steven Elliser	My wife runs a research nonprofit out of our home called Pacific Mammal Research. And she focuses on harbor porpoise, harbor seal, and the otter populations that live in and around Anacortes and the San Juans. I am also an employee at the Tesoro refinery. I'm a software engineer. And what might not be clear to everyone is these are not incompatible things. Everyone I work with at Tesoro cares deeply about the environment and this community. We live in this community. We are literally neighbors. And we can do everything at once. We want to make less fossil fuel and more durable goods. We want to make cleaner fossil fuels. I drive a hybrid. I want to use less fossil fuels. But everyone is welcome to do what they want. This is a boating community. Most folks [unintelligible]. We make that stuff. We want to make it cleaner. We want to make it safer. There is really no downside to this proposal. My family is very pro-science. We have multiple college degrees. I have the fewest in the family, with two.	Thank you for your comment.
Other-0851	Steven Elliser	I strongly recommend that this proposal be supported; that Tesoro be allowed to [unintelligible].	Thank you for your comment.
Other-0852	Steve Garey	I'm a retired refinery worker and past president of United Steelworkers Local 12-591. I spent 24 years working in the Tesoro refinery. I believe that permitted projects like Clean Products Upgrade should provide significant benefits to the community and not just to investors. I believe this project on the whole does that	Thank you for your comment.

ID	Contact	Comment Text	Response
		and therefore should be permitted.	
Other-0853	Steve Garey	All together, I believe this project represents significant benefits to our community, even more so if risk could be eliminated or mitigated. Therefore, I encourage support and believe the project should be permitted.	Thank you for your comment.
Other-0854	Stephanie Hamilton	I am tonight speaking on behalf of the Board of Directors of the Anacortes Chamber of Commerce. I'm the president of the chamber, and our board unanimously voted to take a position of support on this project.	Thank you for your comment.
Other-0855	Stephanie Hamilton	The Tesoro refinery has been a cornerstone of our local economy since it was built back in 1955. It's provided valuable jobs for local residents who grew up here, as well as importing new people who settled and made Anacortes their home. The employees at the refinery volunteer their time and treasure our local charities, schools, and service organizations. We are fortunate to have a company that continues to invest both in its local operations as well as in our community. On behalf of the Board of Directors of the Anacortes Chamber of Commerce, I urge you to complete this report and approve permits necessary for this project to move forward.	Thank you for your comment.
Other-0856	Jim Macy	I support the CPUP project. All the major projects at the refinery have been aimed at helping our environment, such as the FGR, SHU, BenSat, FGS. The refinery is committed to our local community and our environment.	Thank you for your comment.
Other-0857	Devon Grennan	<p>I am in support of this project as both a citizen of Washington and a current marine service provider working for Tesoro.</p> <p>I consider myself a strong and practical environmentalist, and my company's core marine services support both preventative engagements with Tesoro as well and every day operations at the Anacortes facility. I believe in the need to move toward renewable energy sources but I also am aware that this takes time and should be part of a planned transition. This approach by Tesoro fulfills</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
		that transition in an appropriate and balanced way.	
Other-0858	Devon Grennan	There is a need for the products they will produce and this project allows Tesoro to remain viable and competitive. Tesoro has shown that they are strong supporters of the Anacortes community and consequently I support their pursuit of this project and hope that you will approve their request to move forward.	Thank you for your comment.
Other-0859	Bret Andrich	<p>I am writing in regard to the Draft Environmental Impact Statement Process that the Tesoro Anacortes Refinery is currently pursuing for their CPU Project. I am in support of this project as both a lifelong member of the community and a current contractor working for Tesoro.</p> <p>I consider myself a strong and practical environmentalist. I believe in the need to move toward renewable energy sources but I also am aware that this takes time and should be part of a planned transition. There remain needs to be filled prior to any total departure from fossil fuel resources.</p> <p>In the 10 years that I have been working together with Tesoro Anacortes, I have found them to share my concerns about the environment and I know they have displayed a very strong commitment to protecting against environmental accidents.</p>	Thank you for your comment.
Other-0860	Bret Andrich	Tesoro has shown that they are strong supporters of our community and consequently I support their pursuit of this project and hope that you will approve their request to move forward.	Thank you for your comment.
Other-0861	Charles Schultz	<p>I am in favor of the Tesoro Clean Products Upgrade Project, and of the EIS as it is written.</p> <p>What I like about this project is that some gasoline range hydrocarbons (mixed xylene) , rather than being burned as fuel, are going to be used for manufacture of durable goods. This is a much better use for these hydrocarbons.</p>	Thank you for your comment.
Other-0862	Melissa Crezee	I happen to work with Tesoro also, specifically for the CPUP project, as an engineer -- process engineer. I know the effort that	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>Tesoro puts behind ensuring everything is done to the highest standards for environmental safety and personnel safety. And I would like to show my support and encourage Skagit County to see the benefits that this project and that this environmental study is adequate in covering the concerns and how this project will generate revenue for this community. It will bring value product for our country and is environmentally responsible for our world, because Tesoro does care about the efforts that we put in to ensure that we've done everything we can to be responsible.</p>	
Other-0863	Tom Hess	<p>I urge you to approve the final draft environmental impact statement as soon as possible.</p>	<p>Thank you for your comment.</p>
Other-0864	Jeff Brooks	<p>We've been doing business with the refineries for decades. We've been impressed with their oversight. We understand there are risks involved. Everybody here has done a very good job of explaining those risks and giving their opinions, of which I appreciate those. Our feelings at Central Welding Supply are that we're dealing with a very responsible partner, Tesoro. We're excited to be a part of the expansion. And we feel fortunate that we actually have the ability to be involved in these kinds of projects, because there's so many places in our state and in our country that don't have the capabilities like this or don't have the abilities to be involved. The economics just don't make sense. We have people that are spending money. They're investing in our community. They're investing in our jobs. They're helping local charities. And, for that, we're very thankful.</p>	<p>Thank you for your comment.</p>
Other-0865	Gordon Zurn	<p>I'm ...the financial secretary for the Local 12-591 United Steelworkers. The United Steelworkers support permitting and construction of the Tesoro Clean Products Upgrade Project. While we have some concerns related to employee safety, community safety, and environmental protections, we believe the issues can be addressed by the EIS process. As a result, we believe the benefits to our members and the local economy are much greater and well worth the potential risk.</p>	<p>Thank you for your comment.</p>

ID	Contact	Comment Text	Response
Other-0866	Andy Mayer	I'm a resident of Anacortes and the president and CEO of the Mount Vernon Chamber of Commerce. I'm here tonight on behalf of the Mount Vernon Chamber, who enthusiastically supports Tesoro's Clean Products Upgrade Project.	Thank you for your comment.
Other-0867	Andy Mayer	Any project that is good for our local economy, supports families, is good for the environment, deserves to be approved -- which is why the Mount Vernon Chamber is in full support of the project.	Thank you for your comment.
Other-0868	Ian Faley	I work with the Boys & Girls Club in Skagit County. I would like to voice my support for Tesoro in their proposed expansion business in the region, especially stress the improved -- look at social and economic impact for the Draft EIS that comes to its final stage. For the last three years, I've had the pleasure of working with the Tesoro leadership team as well as many of their employees, parents, and club members in support of youth development in our organization. Specifically, Tesoro has made targeted and high-impact STEM programs and activities available to more than 1,000 members through our clubs and increased opportunities for youth around the area as well as in support of their families. I've been impressed by the honesty, integrity, respect, and commitment everyone at Tesoro has exemplified both through our partnership as well as work throughout the area. The character of the leadership team, the incredible commitment Tesoro has shown in supporting local families, local agencies, and local initiatives is tremendous and demonstrates a level of care that we look for in a strong community and what we expect in terms of high corporate social responsibility. At the clubs, we stress the importance of healthy and thriving families and communities. And we underscore hard work, collaboration, and diligence that it takes to make these happen. We support our business and civic leaders as we partner in this endeavor, realizing that it is through partnerships like this that a sustained strong employee foundation -- strong opportunities, strong families -- that our youth and all of our families benefit. Tesoro stood out as a company that shares its mission and have used their work with a shared ethos. We hope they remain a great driver of economic stability and growth in our	Thank you for your comment.

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		area	
Other-0869	Bryce Oxford	I believe the County should complete its review as soon as possible so this project can move forward.	Thank you for your comment.
Other-0870	Chuck Hoover	I'm a retired engineer with the paper industry and which has a lot of commonality with the petrochemical industry. So, I have some understanding about what's going on there. I'd like to voice my support for Tesoro's Clean Products Upgrade Project because it has a significant number of benefits for the community and only very minimal risks.	Thank you for your comment.
Other-0871	Bruce H Gillett	I believe that the project will be good for the community, good for employees, and good for the refinery.	Thank you for your comment.
Other-0872	Julie Kinder	I have a bachelor's degree in chemical engineering. I have about 30 years, more or less, experience in the industry. I wanted to share my views on the project, and I appreciate this opportunity. My comments are offered in support of both work done by Skagit County in producing the Draft EIS and of the Clean Products Upgrade Project that is proposed by Tesoro. I am a Tesoro employee, and I'm also an advocate for the environment that we all live in. As has been pointed out by others, these are not incompatible positions. It's important to all of us that we live in a clean and healthy environment. I very highly value the time I spend in nature -- hiking, backpacking, kayaking, and volunteering. I value my job with Tesoro which allows me to contribute not only my time, but financial resources that are aimed at conservation and to the environmental benefits that I like to try and help to bring to the world that I live in. For two years I have served as Tesoro's engineering manager on this project, so many of the documents that have been reviewed have been produced with my support. I can personally attest to the dedication and professionalism of the hundreds of Tesoro employees and contractors who've worked on the project's engineering and design. We have devoted ourselves to ensuring that this project delivers on the expectations that are outlined in our project documents and that are summarized in the Draft EIS. [Unintelligible] the project is viewed ultimately as a	Thank you for your comment.

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		success by the community as well as by the company.	
Other-0873	Ron Danielson	I'm for it 100%! It's a great idea. Totally good for the Skagit Valley and the country!	Thank you for your comment.
Other-0874	Warren Tessler	And, you know, I think, you know, people are -- here -- certainly raising some constructive criticisms. And those should be taken into account in the overall balance of things. But, by and large, I think this is something to be seriously considered and dealt with and overall support it.	Thank you for your comment.
Other-0875	Sandy Childs	I want to express my SUPPORT for the Tesoro Clean Products Upgrade Project. As a member of the Anacortes community I would like to see this project approved.	Thank you for your comment.
Other-0876	Julie Kinder	Thank you for the opportunity to share my support of the project - - which we have designed to deliver a safe, reliable, and environmentally responsible project.	Thank you for your comment.
Other-0877	Mike Culley	I'm speaking as a Tesoro contractor out there at the facilities. I'm in support of the project.	Thank you for your comment.
Other-0878	Mike Culley	Many of the contractors in Tesoro -- employees -- are tied to the countless numbers of clubs and organizations, teams, churches, and leaders throughout the area. I have folks that work for me that are coaches on the local teams. I've been a coach myself. And those kids that work, that I've taught -- brought up a little bit through middle school, high school -- those kids are now looking for jobs, and many look up to us providing those kind of jobs. They look to us with hope.	Thank you for your comment.
Other-0879	Bruce Rustad	The fact that Tesoro is investing in this project and this community demonstrates their concern and respect for the community and	Thank you for your comment.

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		environment where they do business.	
Other-0880	James M Strong	This letter is written in support of Tesoro Corporations proposed construction and operation of a xylene production facility at its Anacortes refinery.	Thank you for your comment.
Other-0881	Erica Pickett	<p>While we may wish that our world could be free of petrochemical products, that is not the world we have and we must recognize our responsibility to minimize the harm due to these products and their manufacture.</p> <p>I believe that Tesoro makes a good case for expansion into the production of xylene. The recapture of the fumes and protection of the shores ide environment is a huge improvement over what they have now at dockside.</p> <p>I support these improvements and their application for the permit.</p>	Thank you for your comment.
Other-0882	Steve Wilhoit	<p>Since activist NGO's and government regulators have made it virtually impossible to build new refineries, it is critically important that existing facilities are supported to the maximum extent possible. The March point facilities represent 2 of only 5 such facilites in Washington state and have been operating successfully for more than 60 years.</p> <p>The proposed modifications and Improvemets to the Tesoro facility will contribute significantly to its business operations, improve its processing quality, reduce its local , already limited environmental impact and provide more highly valuable and desired products from its oil processing operations. The activities are simply a relatively small but important growth in its existing operations, potentially negating impacts else where- such as the need for an entirely new plant.</p> <p>Most of the identified concerns are those that are already addressed by the fact that the facility exists and have been operating for more than half a century. The plant is already licensed to operate and as such meets current requirements.</p>	Thank you for your comment.

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Other-0883	Dustin Small	I am submitting my comments in support for Tesoro's Clean Products Upgrade Project. This project is the best way to keep our community strong by allowing Tesoro to diversify their business and invest in our community while protecting our environment.	Thank you for your comment.
Other-0884	Dustin Small	<p>Tesoro is continuously giving back to our community, and helps make it a wonderful place to live. Last year alone, the Tesoro Foundation provided over \$1 million in funding to local organizations. They continue to be a committed and responsible investor in our community, our local programs and service organizations, and our local events.</p> <p>I appreciate all that Tesoro has done for our community and support them and their upgrades project.</p>	Thank you for your comment.
Other-0885	Matt Miller	Tesoro should immediately be granted approval for their Clean Products Upgrade. Not only will marine vapor emissions be reduced significantly, but the economic investment in a more diverse product mix will enhance this already key Skagit County asset.	Thank you for your comment.
Other-0886	Curt Oppel	I support Tesoro's proposal to expand and install these new facilities.	Thank you for your comment.
Other-0887	Curt Oppel	The impact of these is minor as stated in the EIS, and this expansion should be allowed.	Thank you for your comment.
Other-0888	Steve Wilhoit	This citizen , local resident and taxpayer requests that the Tesoro proposal be approved in its entirety.	Thank you for your comment.
Other-0889	R Martin Laumbattus	Please accept this comment in support of the proposed project at Anacortes Tesoro refinery. Provided the proponent is required to meet all environmental regulations are these upgrades should be allowed. Thank you for your consideration.	Thank you for your comment.
Other-0890	Diana Jordan-New	I am writing to express my support for Tesoro's Clean Products Upgrade Project.	Thank you for your comment.

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Other-0891	Diana Jordan-New	<p>The fact that Tesoro is investing in this project and this community demonstrates their concern and respect for the community and environment where they do business.</p> <p>I believe the Draft EIS is comprehensive and considers all of the relevant issues that could impact our community. I am proud to support this project and I believe it will bring many benefits to our community.</p>	Thank you for your comment.
Other-0892	Anacortes Chamber of Commerce, Stephanie Hamilton	On behalf of the Board of Directors of the Anacortes Chamber of Commerce, I would like to express our support for the Tesoro Clean Products Upgrade Project based on the significant positive impacts it would bring to the Anacortes community.	Thank you for your comment.
Other-0893	Anacortes Chamber of Commerce, Stephanie Hamilton	Beyond the environmental and economic benefits of this project there are the social benefits. The Tesoro refinery has been a cornerstone of the community since its construction back in 1955. The employees are local residents who volunteer at our schools, non-profits and service organizations. Both the refinery and its employees have donated millions of dollars and countless hours to improving the quality of life here in Anacortes and the surrounding communities.	Thank you for your comment.
Other-0894	Skagit Business Alliance, Christina Jennings	<p>The combination of economic and environmental benefits associated with this project are worthy of approval based on the analysis provided in the Draft Environmental Impact Statement.</p> <p>On behalf of all the members of the Skagit Business Alliance, I thank you for the time and resources the County has invested in preparing this complete and comprehensive Draft Environmental Impact Statement and I urge you to approve the appropriate permits so that this project can move forward.</p>	Thank you for your comment.
Other-0895	Walter Guterbock	I support Tesoro's application. It will enable better compliance with environmental regulations and will increase the productivity and efficiency of the refinery.	Thank you for your comment.
Other-	Walter Guterbock	Fossil fuels will be our main energy source for our lifetimes and	Thank you for your comment.

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0896		those of our children, and people forget all of the other uses of petroleum in pharmaceuticals, plastics, auto manufacturing, appliances, packaging, and almost any product that contains plastics. Maintaining energy self-sufficiency in petroleum is an important factor in our national security.	
Other-0897	United Steelworkers Local 12-591, George Welch, Gordon Zurn	USW Local 12-591 supports permitting and construction of the Tesoro Clean Products Upgrade Project (CPUP).	Thank you for your comment.
Other-0898	Charles Hoover	<p>As a resident of Anacortes, I would like to express my support for the Draft Environmental Impact Statement (DEIS) that was prepared by Skagit County employees and their supporting contractors.</p> <p>I believe that the Statement fairly describes the project, carefully examines its potential environmental impacts and their associated mitigations. While the project does present some incremental risks, they appear to be insignificant in comparison to the to the full operation of the refinery and are more than balanced by the project benefits which include family-wage jobs, increased tax base and reduced emissions.</p>	Thank you for your comment.
Other-0899	Steve Garey	MY NAME IS STEVE GAREY. I'M A RETIRED REFINERY WORKER, AND PAST PRESIDENT OF UNITED STEEL WORKERS LOCAL 12-591. I SPENT 24 YEARS WORKING IN THE TESORO REFINERY. I BELIEVE TO BE PERMITTED, PROJECTS LIKE THE CLEAN PRODUCTS UPGRADE SHOULD PROVIDE SIGNIFICANT BENEFITS TO OUR COMMUNITY AS WELL AS TO INVESTORS. I BELIEVE THIS PROJECT IN THE WHOLE DOES THAT, AND THEREFORE SHOULD BE PERMITTED.	Thank you for your comment.
Other-0900	Steve Garey	ALL TOGETHER, I BELIEVE THIS PROJECT REPRESENTS SIGNIFICANT BENEFITS TO OUR COMMUNITY, EVEN MORE SO IF RISK CAN BE ELIMINATED, OR MITIGATED IN THE FINAL EIS. THEREFORE, I ENCOURAGE SUPPORT, AND BELIEVE THE PROJECT SHOULD BE PERMITTED WITH ALL APPROPRIATE MITIGATIONS IN PLACE THAT ARE NEEDED TO INSURE WORKER AND COMMUNITY SAFETY, CLIMATE PROTECTION, AND SPILL PREVENTION.	Thank you for your comment.

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Other-0901	Allen Workman	I wholeheartedly support the CPUP project proposed by Tesoro. The mere fact that they will be performing vapor containment and recovery should make this project in and of itself worthwhile.	Thank you for your comment.
Other-0902	Allen Workman	And the manufacture of Xylene is a further example of extracting from every barrel of oil, a useful product.	Thank you for your comment.
Other-0903	Allen Workman	Please support this project.	Thank you for your comment.
Other-0904	John Olsen	I firmly believe that Tesoro has done their due diligence and I fully support their plan of action.	Thank you for your comment.
Other-0905	Brian Johnson	<p>I am writing to extend my support for the CPUP project at Anacortes Tesoro. As a Anacortes citizen of over 20 years and small business owner I have spent a great deal of time reviewing the CPUP EIS and find the proposed improvements to be a huge asset to this community from a safety and economic standpoint.</p> <p>I applaud Tesoro for their diligence and professionalism in providing 3rd party environmental review of the proposed improvements, they have been extremely transparent and forthcoming with all their information. I hope that "others" will take the time to verify and validate the facts before rendering a negative opinion simply based on their personal bias towards refineries and/or expansion.</p>	Thank you for your comment.
Other-0906	Robert Christie	Don't let these hippies get in your way! They don't understand what the effects of stopping oil and chemical production would have on our daily lives. They are simple minded folk afraid of wifi. Just do your best to keep our water clean.	Thank you for your comment.
Other-0907	Rosette Dawson	<p>As far as I'm concerned, Tesoro has been a good neighbor. They are very tied to our community so why shouldn't we support them? They've supported ACT community theatre and Boys and Girls Club STEM program to name a few.</p> <p>I've been on a tour of their refinery and seen where they plan to</p>	Thank you for your comment.

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		put the xylene facility. It seemed very spacious and set away from anything that would cause problems within the refinery.	
Other-0908	Rosette Dawson	I have few qualms about supporting Tesoro in their new endeavor.	Thank you for your comment.
Other-0909	Louella Bergeson	<p>Because of the support which comes to the aid of so many people in Skagit County, from Tesoro Refinery and other companies who are community- minded as is Tesoro, our hospital is rated #3 in Washington state, and our schools are rated #10.</p> <p>I was born in Anacortes 82 years ago, employed at Shell Oil 1956 - 1962, and my husband Richard, started with Shell Oil when the refinery "started up" in '55, retiring 6-1-87. We both support Tesoro and believe this project called the Clean Products Upgrade Project will be safe and have great economic benefits to our area!</p>	Thank you for your comment.
Other-0910	Rene Vance	I am writing with my support of the Tesoro Anacortes Clean Products Upgrade (CPUP) project. The project will benefit our community by enhancing the long-term viability of the Tesoro facility, thereby enhancing the economic stability in our area also.	Thank you for your comment.
Other-0911	Rene Vance	<p>As a resident of Anacortes with children in our schools, I understand what an important role the refineries play in our community: STEM programs are supported, scholarships are given, Fun Runs are held to benefit local United Way and Anacortes Schools Foundation organizations, Junior Achievement classes are held, Citizen Patrol cars, Fire Department and Island Hospital equipment are provided, Anacortes Community Theater productions are sponsored, and Waterfront and Wine festivals are supported, just to name a few programs that the refining corporations support. In addition to those organizations that the companies directly support, numerous employees and contractors are active in our communities coaching little league and AAU basketball teams, leading Boy Scout and Girl Scout troops, helping tutor students, leading classes for the Anacortes Senior College, and volunteering at various events and service organizations.</p> <p>In 2010, there was a real threat that the Tesoro Refinery could</p>	Thank you for your comment.

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		<p>shut down. I recall the School District asking specifically on our children’s registration form if their parents worked for a refinery. The closure of a refinery would have serious implications on the District enrollment, revenue and budget. Tesoro chose to continue to invest in the Anacortes Refinery and its employees, despite a tough economic environment. The community has benefitted greatly since that time. Over the past year, Tesoro contributed over \$1MM to local clubs and organizations.</p>	
Other-0912	Keith Lively	<p>Around here, Tesoro impacts almost every single person in our community; whether through a family member, friend or employer who does business with the refinery. The positive contributions Tesoro has made in our community are visible throughout the County. Over the last year, Tesoro invested over \$1 million in local clubs and organizations, such as the Boys and Girls Club, The Anacortes Family Center, Padilla Bay Foundation, Skagit DVSA and numerous local STEM education programs.</p>	Thank you for your comment.
Other-0913	Walter Burrougs	<p>This is such a good project you would even think that the refinery would have been asked to do the project by a regulatory agency.</p>	Thank you for your comment.
Other-0914	Jeff Swayze	<p>I am proud to support this project and to work for a company that is willing to invest in the future of our community. Our refinery has been a steadfast member of Skagit County for over six decades, and this proposed project represents Tesoro’s continued commitment in our community. The CPUP is a clear sign of the company’s intention to continue investing in Skagit County.</p>	Thank you for your comment.
Other-0915	Arno Jansen	<p>I am proud to contribute to the positive work the refinery does for local families. Around here, Tesoro impacts almost every single person in our community; whether through a family member, friend or employer who does business with the refinery. The positive contributions Tesoro has made in our community are visible throughout the County. Over the last year, Tesoro invested over \$1 million in local clubs and organizations, such as the Boys and Girls Club, The Anacortes Family Center, Padilla Bay Foundation, Skagit DVSA and numerous local STEM education programs. The refinery has been a steadfast member of Skagit</p>	Thank you for your comment.

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		County for over six decades, and this proposed project represents Tesoro's continued commitment in our community.	
Other-0916	Arno Jansen	I believe the draft EIS is comprehensive and adequately considers all of the issues relevant to safety and environmentally friendly operations which affects both myself and the community.	Thank you for your comment.
Other-0917	Mark Burriss	I believe proposed mitigations to potential impacts are sufficient.	Thank you for your comment.
Other-0918	Ross Reid	I want to see Tesoro specifically responsible for ...contributing a large sum of money towards environmental conservation here in the Northwest ...	Thank you for your comment.
Other-0919	Robin Everett	I think that if we do approve this project, we need to make sure that it is properly mitigated; that the project is held to the highest standards.	Thank you for your comment.
Other-0920	Charles Schultz	I encourage you to do a close review of the project, work with the Tesoro refinery staff to develop mitigation plans should issues arise, and then grant approval for the CPUP .	Thank you for your comment.
Other-0921	Alex Ramel	The second point I'd like to make -- I spoke at the beginning earlier about the challenges with the existing proposed crude oil/gas mitigation in the DEIS and requested that a better standard be applied and different mitigation alternative be developed and approved. And I just want to make the point that this is an area where I think that most of us focused on the environmental protections share interest with folks who are concerned about economic development and job creation. Because a mitigation program that meets those high standards will create local jobs that pay living wages in the clean energy sector in this region. The best example of those is the community energy challenge that Jeff Aslan spoke about earlier. It's all relating to the energy efficiency at work, in homes and small businesses -- Whatcom, Skagit, Island, and San Juan Counties. And those are living wage jobs. And they are already improving, benefitting the communities impacted by	Thank you for your comment.

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		the refinery.	
Other-0922	Phyllis Dolph	<p>Skagit County should include language in the final EIS that:</p> <p>...</p> <ul style="list-style-type: none"> • Fully offsets any increases in refinery pollution by specifically supporting mitigation projects in Northwest Washington. 	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Potential impacts on air quality and preventive measures to help control emissions are discussed in Section 4.4 of the Draft EIS. The proposed project’s GHG emissions and potential mitigation have been further analyzed in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Other-0923	Sandy Robson	Fully offset any increases in refinery pollution by specifically supporting mitigation projects in Northwest Washington	<p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Potential impacts on air quality and preventive measures to help control emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>The proposed project’s GHG emissions and potential mitigation have been further analyzed in Section 3.3 of this Final EIS. Proposed mitigation measures are included in Chapter 4 of this Final EIS.</p>
Other-0924	Anne Winkes	Mitigation: It is the responsibility of Skagit County partment to ensure the safety of the sensitive waters of Padilla and Fidalgo Bays and the wildlife the waters support. Even a small spill can cause significant harm to not only individual organisms, but also to entire populations.	Thank you for your comment.
Other-0925	Virginia Wolff	<p>Regarding the xylene processing component of this proposal, the Final EIS must include conditions or mitigations discussed above that address:</p> <ol style="list-style-type: none"> 1. Comprehensive vessel and spill analysis that considers both cargo and propulsion fuels and includes all reasonably foreseeably increases in future vessel traffic, 2. Limits on the numbers of oil trains received by the refinery to no more than current levels, 	<p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project. Additional information regarding proposed mitigation measures, including those for GHG, worker safety wetlands, and spill risk, are provided in Chapter 4 of this Final EIS.</p>

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		<p>3. Stringent worker safety provisions,</p> <p>4. Full accounting of all green house gas emissions with appropriate mitigations,</p> <p>5. Language or additional permits which explicitly disallows foreign export of crude oil as part of this project,</p> <p>6. A more thorough analysis of vessel noise impacts on killer whales with mitigations, and 7. Requirement for adequate tug escort of all vessels carrying reformate or xylene for this project sufficient to ensure safe passage throughout the Salish Sea.</p>	
Other-0926	Fidalgo Bay Aquatic Reserve Citizen Stewardship Committee	Tesoro should acquire much additional similar aquatic lands and habitats and put them under permanent protection as a condition of this project.	Thank you for your comment.
Other-0927	Protect Skagit, Washington Environmental Council, RE Sources for Sustainable Communities, ForestEthics/Stand, Friends of the San Juans, The Lands Council, Climate Solutions, Puget Soundkeeper Alliance, Friends of the Earth, Sierra Club, Washington Chapter, Oregon Physicians for Social Responsibility, Washington Physicians for Social Responsibility, Friends of the Columbia Gorge	<p>We are also concerned that the current draft misses a critical opportunities to require mitigation for otherwise significant impacts including:</p> <p>? An enormous increase GHG emissions lacking an inappropriate offset;</p> <p>? An increase in crude oil trains and/or reliance on an ongoing violation of Swinomish rights;</p> <p>? Increases in stormwater runoff and decrease in the site's ability to store and absorb runoff, including the destruction of wetlands; and</p> <p>? Increases in quantities and types of toxic and hazardous substances and corresponding increases in risks of spills, environmental contamination and human exposure.</p> <p>Further details are provided below. We urge you to incorporate these absences and potential improvements into the revised Final EIS.</p>	<p>The proposed project's GHG emissions and potential mitigation have been further analyzed in Section 3.3 of this Final EIS.</p> <p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The proposed project would be constructed mostly in previously developed areas within the refinery, with the exception of the New Tanks Area and Potential Temporary Laydown Area. In total, up to 28 acres of land would be disturbed during construction. The approximately 23.4 acres of land that would be disturbed currently do not drain to the OWS and SWS. Stormwater from these areas would drain through sheet flow toward Fidalgo Bay and would also infiltrate to groundwater. Stormwater at the New Tank Area and Temporary Laydown Areas would also drain to detention ditches, where it would infiltrate to groundwater and evaporate. If soil was released into stormwater at locations that</p>

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			<p>do not drain to the OWS or SWS, sediment would be deposited in ditches and surrounding grassed areas.</p> <p>Additional discussion of tribal resources has been included in Section 3.8 of this Final EIS.</p> <p>The Draft EIS discussed the potential impacts to terrestrial species should a spill of xylenes or reformate occur in the marine environment and concluded there was a potentially significant impact to these species. The Draft EIS discusses the toxicity of xylene and reformate in the marine environment in Section 6.4.3.3 and Table 6-9.</p> <p>The toxicity of xylene to humans is discussed in Section 9.6.2.1 of the Draft EIS. Additional information regarding xylene exposure in humans is found in Section 3.6.2 of this Final EIS.</p>
Other-0928	Anne Winkes	Mitigation: Adverse impacts to the health, safety and welfare of its workers, the surrounding community, and the environment caused by Tesoro's proposal to include the production, marketing, and distribution of petrochemicals, like xylene, in its scope of practice are unmitigable.	Thank you for your comment.
Other-0929	Rebecca Kimsey	All threats to the environment must be carefully evaluated and fully mitigated. This area is too priceless to casually abuse.	Thank you for your comment.
Other-0930	Elizabeth Milburn	It has been brought to my attention that the chemical xylene will be used and the expansion company does not have a mitigation plan currently. Please notify Washington residents of your plans for protecting the environment in light of this proposed expansion.	<p>The refinery's existing spill prevention and response plans, , including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project.</p> <p>Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Washington State Department of Ecology, and USEPA. Additional information regarding the agencies responsible for regulating marine vessel transportation and spills is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a</p>

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			<p>spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Vessel safety and waterway management – Section 13.4 • Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-0931	Steven Horneffer	<p>As you continue the environmental review, please ensure that the Final EIS:</p> <p>...</p> <p>Posts a bond to cover the costs of the inevitable disaster.</p>	<p>As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.</p>
Other-0932	Rebecca Durr	<p>Requires a bond sufficient to compensate all damage which could result from a worst-case-scenario accident.</p>	<p>As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.</p>
Other-0933	Rebecca Durr, Greg Durr	<p>As you continue the environmental review, please ensure that the Final EIS:</p> <p>...</p> <p>Requires a bond sufficient to compensate all damage which could result from a worst-case-scenario accident.</p>	<p>As described further in Section 3.7.2 of this Final EIS, Tesoro and/or the independent vessel owner would be financially responsible to pay spill cleanup costs and pay damages in accordance with federal (OPA 90 and CERCLA) and state (Water Pollution Control Act) regulations.</p>
Other-0934	Melissa Crezee	<p>My current position is assigned to the CPUP project, so I know the effort that is being made to ensure safe and responsible operation. Tesoro values these qualities without exception.</p>	<p>Thank you for your comment.</p>
Other-0935	Greg Forney	<p>It [Tesoro] has been the safest refinery I have worked in. They train all employees and contractors to be responsible for zero</p>	<p>Thank you for your comment.</p>

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		environmental incidents.	
Other-0936	Jeff Schwab	<p>In my opinion Tesoro is a leader of safety and environmental respect in our area and works diligently to instill that culture with their employees. No industry that i have worked with in my career has and equal level of culture.</p> <p>I am very fortunate to have several Tesoro employees and contract employees as members in the volunteer fire department at which I am the Assistant Fire Chief. They bring to us a very high level of knowledge in regards to emergency response and most importantly Tesoro's safety culture. The Tesoro employees are seen as leaders within the fire department and their culture has spread to our organization.</p>	Thank you for your comment.
Other-0937	Jane Alynn	<p>From what I've read, the principle pathway of human contact is via soil contamination from leaks from the tanks. Tesoro has an abysmal safety record. According to Sightline Institute (http://www.sightline.org/2014/03/21/tesoro-a-track-record-of-pollution-hostility-to-workers-and-meddling-in-politics/), they were "found to have a lax safety culture, which led to a 'complacent' attitude towards flammable leaks and occasional fires; that Tesoro did not correct a history of recurring leaks and placed workers in dangerous conditions; that Tesoro did not adequately maintain equipment before the lethal blast; and that the accident was rooted in "a deficient refinery safety culture, weak industry standards for safeguarding equipment, and a regulatory system that too often emphasizes activities rather than outcomes." Seven Anacortes people died in the 2010 fire.</p> <p>Even if the EIS declares a "less than significant impact," why would our community entrust Tesoro to meet the proper maintenance required for safety?</p> <p>Again, from Sightline, "Tesoro CEO Greg Goff said recently, 'Protection and care of the environment are fundamental to our core values.' Unfortunately, that was in a prepared statement issued after a burst Tesoro pipeline was responsible for one of the largest spills ever recorded in North Dakota—a spill that the</p>	<p>The proposed project is designed with secondary containment systems to contain leaks from tanks at the refinery and spill detection devices to alert workers in the event of a spill. The system was designed such that spills within the developed portions of the refinery would be contained and either cleaned up immediately or routed to the oily water sewer system and then treated at the refinery's wastewater treatment plant. If the containment failed or a spill occurred outside of containment, response measures would be implemented to control the spill.</p> <p>The proposed project is at the Tesoro Anacortes Refinery. The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Operational site controls– Section 2.8.5

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		<p>company didn't even bother to tell the affected landowner about."</p> <p>Why would we trust Tesoro to be transparent about their activities once the plant is operational?</p>	<ul style="list-style-type: none"> • Potential impacts from unplanned events, including fires, explosions, and spills– Section 9.6 • Coordination and training of Tesoro and local emergency service providers– Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents– Appendix 2-A
Other-0938	Phyllis Dolph	<p>Our refinery does not have a good track record about safety measures. The 2010 explosion which killed so many is but one incident.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0939	LeeAnn Chastain	<p>In addition, the safety record of this industry is not adequate.</p>	<p>Thank you for your comment.</p>
Other-	Jim Sasken	<p>Tesoro is a very safe operating company who takes safety and the</p>	<p>Thank you for your comment.</p>

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0940		environment a very serious matter.	
Other-0941	Arlan Kusters	They [Tesoro] have the best safety standards in the business and are prepared to handle any things that could go wrong!! They have been here and know that they have to protect the environment!!	Thank you for your comment.
Other-0942	Anne Elkins	I don't necessarily trust Tesoro's safety record: there was a major incident caused by neglect of safety procedures at the Anacortes refinery a few years ago.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0943	Anne Elkins	As mentioned above, I don't trust Tesoro's safety record either at the Anacortes refinery, or the company's safety record in general. The workers' safety is at risk, as well as the community's.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section</p>

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			<p>3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0944	Marnie Pennington	I understand that Tesoro has been fined for elements relating to safety...but have not paid the fines. Not sure why, but I feel that this project can not even be considered until these current violations be addressed.	Additional information regarding agencies responsible for imposing and collecting fines related to safety violations is provided in Table 2 in Section 3.1 of this Final EIS.
Other-0945	Wendy Courtemanche	Tesoro's record on safety and integrity is not an encouraging one for its neighbors here in northern WA. It has been accused of laxness on safety, endangering workers, violating the Clean Air Act, and failing to notify the public of environmental and safety issues.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6

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			<ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Additional information regarding the agencies responsible for regulating worker health and safety, human health, air emissions, and other environmental issues is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0946	Ruth Holder	Like most of us in Skagit, I have friends and relatives who worked in and lived near refineries. The existential threat of working in this high hazard process industry was confirmed for all of us by the April 2nd 2010 explosion and fire that claimed the lives of 7 workers and devastated their families, their co-workers, friends, communities.	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning</p>

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			<p>with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0947	Libby Mills	I am a biologist and teacher. I live right next door to the Padilla Bay National Estuarine Research Reserve facility, and I live within listening distance to when the terrible explosion happened at Tesoro. And I still live with sorrow from that night.	Thank you for your comment.
Other-0948	Ruth Holder	I live in Mount Vernon. Like most of us in Skagit, I have friends and relatives who have worked and lived near refineries. The existential threat of working in this high hazard process industry was confirmed for all of us by the April 2, 2010, explosion and fire. It claimed the lives of seven workers and devastated their families, their co-workers, friends, and communities.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA</p>

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			<p>enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS).</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0949	Juliet Miller	Tesoro has a record of violations of air pollution, and explosions.	Thank you for your comment.
Other-0950	Bob Hall	<p>11. Tesoro's history of violations of regulations was not adequately covered in the DE IS. Only two incidents were mentioned. The DEIS should list and analyze each violation and explain how it was resolved. As I recall, Tesoro usually argues and denies them, and then settles.</p>	<p>The refinery considered efficiency and safety in the design of the proposed project (see Section 2.9 of the Draft EIS). The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding Tesoro's safety improvements is provided in Section 3.6.3 of this Final EIS.</p>
Other-0951	Jill Rand	With a known track record of violations, dangerous air pollution, and explosions it would be detrimental to the citizens of Anacortes and the environmental of Fidalgo Bay to allow expanded operations and even dirtier oil sources to roll through at increased rates.	Thank you for your comment.
Other-	Lawrence Bullis	I will not in this letter deal directly with the environmental aspects,	The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety

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0952		<p>which are also extremely important.</p> <p>Just to keep it manageable, I will here address specifically the nature of Tesoro as a community citizen, an area in which they are spectacularly deficient.</p> <p>I found the following two accounts of previous Tesoro accidents online. It wasn't at all hard to find. It might have taken me 15 minutes. Please note that both of these examples cite a culture in which profit is valued while safety is expendable. We, right here in Anacortes, have experienced this, tragically, at first hand.</p> <p>...</p> <p>A news release from the U.S. Chemical Safety Board (January 29, 2014) about the Tesoro refinery fatal explosion in April, 2010, in which seven lives were lost: "Company Failed to Apply Inherently Safer Technology, Did Not Install Damage Resistant Materials" "State and National Chemical Safety Regulations Designed to Protect Workers and Surrounding Communities Should be Strengthened, Draft Report Says" "Seven lives were tragically lost at the Tesoro [Anacortes] refinery in 2010," said Dr. Rafael Moure-Eraso, CSB chairperson. "I believe the draft report does an outstanding job of tracing this complex accident to its roots: a deficient refinery safety culture, weak industry standards for safeguarding equipment, and a regulatory system that too often emphasizes activities rather than outcomes. The report is a clarion call for refinery safety reform." http://www.csb.gov/investigation-finds-2010-tesoro-refinery-fatal-explosion-resulted-from-high-temperature-hydrogen-attack-damage-to-heat-exchanger/?SID=97 A story in SFGate, a San Francisco publication, on August 2, 2016 concerning an accident at Tesoro's plant near Martinez, CA in the East Bay region: "The East Bay petroleum plant, part of Texas' Tesoro Corp., did not learn from previous accidents and minimized the seriousness of the 2014 events that hospitalized workers with first- and second-degree burns, the agency [U.S. Chemical Safety Board] concluded. According to the report, the company initially hindered progress on the two-year probe by refusing to let investigators into the refinery and failing to preserve evidence. "The agency launched its review in the wake</p>	<p>measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>of more than a dozen acid spills at the refinery since 2010, two of which- incidents on Feb. 12 and March 10, 2014- were the focus of the recent investigation. "In the February incident, two Tesoro employees were sprayed with sulfuric acid that spurting from a valve due to the failure of a connector tube, the report said. The workers were in the refinery's alkylation unit, where high-octane gasoline is made, with sulfuric acid as a catalyst. From the unit, roughly 84,000 pounds of the acid gushed from the ruptured tube over the next two hours onto the plant's grounds and into its sewer system. "One month later, two contract workers attempting to remove piping were also sprayed with sulfuric acid in the same part of the refinery. The report said the incident was the result of the pipe not being drained of chemicals ahead of time. It also concluded that the incident was similar to a 1999 accident at the refinery, then under different ownership, which killed four people, demonstrating that Tesoro officials hadn't learned from past mistakes." "The federal agency slumped the broader atmosphere at the plant, saying managers emphasized expedited training and maintenance to keep costs low at the expense of worker safety. The report noted that workers weren't provided with functional protective gear and were pressured to use lower acid concentrations without proper safety controls." "While these incidents may appear to be isolated events," Sutherland said, "they are indicative of safety culture deficiencies at the Tesoro Martinez refinery." http://www.sfgate.com/bayarea/article/US-investigators-slug-safety-record-of-EastBay-9067204.php#photo-10698310</p>	
Other-0953	Bryan Potter	<p>The proposed project also mandates construction of a new ARU and expansion of the existing NHT unit. In 2010 the NHT unit was the device whose catastrophic failure resulted in the deaths of seven individuals. Although the unit has since been replaced no mention is made of whether the current NHT was built with inherently safer materials, contains adequate monitors of pressure and temperature, or undergoes regular surveillance for corrosion. These issues and many others are analyzed in exquisite detail by the US Chemical Safety and Hazard Investigation Board as published in their report of May 2014. Perhaps the most</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the</p>

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		<p>concerning conclusion of the investigation is the persistent lack of a reliable safety culture within the Tesoro organization. In fact this particular problem is repeatedly woven throughout the CSB report, and it is reflected in the multiple unreported incidents at the Anacortes facility that culminated in the 2010 disaster. Other Tesoro facilities have experienced recurring accidents also, including sulfuric acid spills at the Martinez refinery. A total of four workers on two separate occasions were injured. Despite these repeated accidents Tesoro administrators have been reticent to cooperate with investigations which subsequently resulted in letters from the CSB to the CEO admonishing them for such.</p>	<p>refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0954	Martha Hall	<p>15. EIS did not adequately state and analyze Tesoro's past record on complying with many various regulations that protect our air, water and workers. Tesoro has been cited for violations many times, not just the two noted in the EIS. Sometimes ships don't have the required booms when at the wharf. Workers are injured or killed. There are spills.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls –

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			<p>Section 2.7.6 and Section 2.8.5</p> <ul style="list-style-type: none"> • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0955	Nancy Hansen	<p>http://www.aljazeera.com/mritems/Documents/2016/12/12/7d7f4de048be4fd4aa68d8ce72741f34_100.pdf</p> <p>The above article needs to be viewed in order to get a good view of the attitudes of the decision makers at Tesoro Anacortes refinery.</p> <p>The responses indicate an extreme disregard for employees welfare in relation to bottom line corporate profits. The strikes by workers in March, 2015, were based largely on extremely illegal work hours required. One report stated someone had not had a day off in 60 some days. 12-hour shifts were common. It does not appear that adequate worker coverage was available to cover absences/vacations, so workers had to cover all this. The other main complaint, extremely relevant to the present corporation request to allow increased capacity, is worker concerns about their safety on the job. The strikes were based both on accidental safety issues, such as can happen with oil under extreme heat, caustics.</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6

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		<p>Also, concerns with a slower kind of negative health effect caused by byproducts benzene and sulphuric acid that can cause cancer or outright death, or the hydrogen sulphide levels in oil that can kill. In the plant, another concern was crumbling asbestos insulation. What has been done about these complaints? (These have occurred not only at this local refinery, but in others on the west coast as well.)</p> <p>After that tragic accident in April, 2010, I noticed that \$45 million was awarded to survivors and victims. This seems like a low value put on lives and people who have to live with disabilities due to injuries beings Shell was taking in this amount every 51 minutes in March, 2015.</p> <p>I believe these facts are extremely relevant to whether these types of workplaces need to exist at all, no matter if they are in the middle of a bay and community, or somewhere unseen by the public.</p>	<ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0956	Nancy Hansen	<p>Does a corporation have rights to destroy the life of species next to its site? The refinery was built in 1958 by Shell Oil. Was the community asked, at that time, if they agreed it should be built there, according to Anacortes records and Skagit County records? According to the majority of members of the community I spoke with, both in a day trip to the city in Spring, 2016, along with a weekend stay during a peaceful action to raise awareness about the real meaning and worth of this refinery, most public workers and citizens were very much against having this refinery damaging tourism and creating a toxic environment within their community. This observation and documentation agrees with the many comments of both local and outside persons who have written about the issue.</p> <p>It needs to be investigated about what input the community had in 1958 on this project. What type of notice were the people given before it was built? Did they have an opportunity to respond? Did the community ever agree to have this plant in their midst at all?</p>	<p>Tesoro acquired the property and developed the proposed project in accordance with regulations in place at that time. However, the initial project construction pre-dated SEPA Rules. Since then, the refinery has been required to obtain and comply with applicable permits as part of general operations, facility upgrades, and expansions. Public input has been solicited and accounted for in decisions by regulatory authorities in accordance with applicable regulations that were in the place at the time of the regulatory decision.</p> <p>The Draft EIS and community consultation associated with the Draft EIS is specific to the Clean Products Upgrade Project.</p>
Other-	Joan Edwins-Petrick	After the disaster at Tesoro where a good friend was lost I urge you to reconsider carefully. I vote NO!!!!!! For my children and	Thank you for your comment.

ID	Contact	Comment Text	Response
0957		grandchildren.	
Other-0958	Joan Edwins-Petrick	After the disaster at Tesoro where a good friend was lost I urge you to consider carefully and vote NO!!!!	Thank you for your comment.
Other-0959	Ed Bennett	<p>Tesoro has a dismal safety record in addition to overworking and even safety violations that have resulted in fines and even death.</p> <p>With this type of record, any approval, would simply be an environmental disaster waiting to happen.</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-0960	Ronald Nichols	;The 2010 refinery fire that killed seven employees which state and federal investigators issued 39 citations of " willful" indifference to hazards at the site.	Thank you for your comment.
Other-0961	Warren Tessler	And, sure, it is a volatile product -- that sort of thing. But they're doing volatile products out there all the time. So, it's one more thing. But they're used to that sort of thing out there. So, you know, by and large it seems to be okay.	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-0962	D Carter LaBarge	<p>I am speaking in support of this project. I'm a contractor that works at Tesoro, and I've been a resident at Anacortes for almost a year. I bring a little bit of a different perspective to the current analysis. I have a great deal of domestic and international experience to draw from. And this experience tells me that the operational standards of Tesoro not only places the environment at the highest level, but the company goes to the extreme to ensure that our community and our wildlife continues to be protected. I have watched our resident refinery eagles raise their young and soar above the plant. This does not happen in other places. This community -- this community's concerns are the same as Tesoro's -- protect our environment and our wildlife. And this statement is backed up by the data requirements that each of us working in the refinery are responsible to uphold. There is no excuse for not doing the right thing at the right time every time. And it's a mandatory requirement for contractors and employees who come through the gate each day. The county holds Tesoro responsible to meet the requirements and the laws. But it's much more than that. It's a partnership that the county, the community, and Tesoro are involved with. Tesoro reminds each of us that work inside the plant that we work at the pleasure of the community. They remind us on a daily basis. And the company is quite serious about doing it this way. So, those are my thoughts.</p>	Thank you for your comment.
Other-0963	Bonnie Miller	<p>The company we are expected to trust to preserve and protect the environmental quality of the area is in the news repeatedly for violations. We cannot trust what they say but must see the money reserved for damage reparations.</p>	Thank you for your comment.
Other-0964	Valerie Rose	<p>If Tesoro wants to create jobs, they should hire additional safety officers and technicians to prevent a repeat of the deadly explosion in 2010.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section</p>

ID	Contact	Comment Text	Response
			<p>3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS.</p> <p>Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0965	Whitney Gonzalez	<p>I work for Mills Electric. We're one of the contractors out there. And I can only talk on what I know from working on a refinery. At the refinery, we have a training -- we have a training -- we have training, and we are taught to -- that we work at the pleasure of the community. And that's something that each and every one of us takes seriously. And not only do we take it seriously at the refinery, a lot of the things we are taught at the refinery, we bring home to our houses and our practices because it's a matter of safety -- it's a matter of safety at the refinery. It's also a matter of safety at home.</p>	<p>Thank you for your comment.</p>

ID	Contact	Comment Text	Response
Other-0966	Kathryn Alexandra	Tesoro has a questionable safety record . Are we guaranteed they have vastly improved their safety procedures?	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-0967	Robyn Hallonquist	Please also consider Tesoro’s track record of violating environmental and safety laws which have led to pollution and explosions in the past. It must be assumed that this past behavior will continue in the future, making negative environmental and health impacts a certainty.	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A

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			<ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-0968	Ruth Holder, Phillip Holder	<p>Wasted Opportunity to Improve Refinery Safety:</p> <p>Skagit County and its decision makers in this matter ought to have a keen and genuine interest in improving safety at Tesoro for the good of the workforce, their families, and the broader Skagit community. The EIS process in this matter should support the mission statement and policy articulated in the County’s Comprehensive Plan to ensure that “the community’s health, safety, and general welfare are protected.” 1 [1 Mission Statement.</p> <p>https://skagitcounty.net/Departments/home/mission.htm. Accessed April 2017; Planning and Development Services. Skagit County Comprehensive Plan.</p> <p>https://www.skagitcounty.net/Departments/PlanningAndPermit/comp_toc.htm. Accessed April, 2017.] The proposed CPUC project offers an important opportunity for the County and its decision makers to meaningfully improve refinery safety for workers and surrounding communities and add a significant layer of protection for the natural environment. This opportunity can be realized by requiring a strong, mandatory and enforceable Process Safety Management program applicable to all processes and process equipment associated with the CPUP project and by requiring Tesoro to actively participate in and fully support the effort to overhaul state Process Safety Management regulations for refineries.</p> <p>Unfortunately the DEIS wholly failed to facilitate this opportunity, giving short shrift to worker safety and failing to connect the dots between an ineffective workplace safety program and impacts on surrounding communities and the natural environment. These flaws in the DEIS, if carried over into the Final EIS, would deprive</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of this Final EIS.</p>

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		<p>decision makers of the opportunity to reduce or even prevent risks from the high hazard processes and chemicals that would be used for the CPUP. It would also deprive the public of having full information about the probable significant adverse impacts of the project. The Final EIS must remedy these defects and fully support implementation of an effective Process Safety Management program for the CPUP applicable over the life of the project.</p> <p>Fatal Tesoro Incident and CSB Findings Not Fully Considered: It has been seven years since an explosion and fire on April 2, 2010 at Tesoro's refinery took the lives of seven employees and devastated their families, their co-workers, friends, and communities in which they lived. 2[Morris, J. 'Get someone up here. We're all dying.' The Center for Public Integrity. and embedded video in Fault Lines documentary series, Al Jazeera English. Dec. 13, 2016. https://www.publicintegrity.org/2016/12/13/20523/get-someone-here-we-re-all-dying. Accessed April, 2017.] The horrific incident occurred in the naphtha hydrotreater process unit (NHT) when a heat exchanger that was in a highly weakened state from high temperature hydrogen attack (HTHA) ruptured catastrophically. This resulted in an explosion and fire that led to the deaths of the 7 workers who were engaged in start-up of an adjacent bank of heat exchangers. Significantly, the investigation and 2014 Report on the Tesoro incident by the Chemical Safety Board (CSB) 3 [CSB (U.S. Chemical Safety and Hazard Investigation Board). Investigation Report: Catastrophic Rupture of Heat Exchanger (Seven Fatalities: Tesoro Anacortes Refinery Anacortes Washington. Report 2010-08-I-WA. May 2014. http://www.csb.gov/assets/1/7/Tesoro_Anacortes_2014-May-01.pdf. Accessed: April 2017. See also CSB. Animation of Explosion at Tesoro's Anacortes Refinery. January 2014 http://www.csb.gov/videos/animation-of-explosion-at-tesoros-anacortes-refinery-/. Accessed April, 2017.] found that this incident could have been prevented.</p> <p>The CSB investigation found that the high stress areas of the heat exchangers were constructed of carbon steel for which HTHA is a damage mechanism causing fissures and cracking. Leaks in the</p>	

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		<p>heat exchangers developed routinely and these leaks sometimes caused fires. Refinery management “normalized” this hazardous situation by directing workers to use steam lances to control the leaks rather than Tesoro taking action to prevent the leaks. Tesoro did not monitor actual operating conditions of the exchangers but instead hired non-employee corrosion experts who relied on design operating conditions using a model that indicated lower susceptibility to HTHA for the heat exchangers. Tesoro did not identify HTHA as a credible failure mechanism for the heat exchangers and failed to identify HTHA as a hazard for the shell of the heat exchangers. According to the report, the refinery’s deficient safety culture required “proof of danger” rather than “proof of effective implementation.” The CSB found overall that Tesoro’s process safety management program, based on practices that controlled risks rather than practices that would substantially reduce risks or prevent them from arising in the first place, was inadequate to prevent such catastrophes.</p> <p>The CSB Report discusses several modifications made to Tesoro’s Process Safety Management (PSM) program following the incident (these are outlined in the DEIS). While we applaud Tesoro’s commitment to take some steps in the right direction, their description in the DEIS raises several important concerns and questions, addressed fully below in the section entitled “DEIS Makes No Progress Toward Necessary Requirements for Effective PSM Program.” The DEIS treats the 2010 fatal incident and the CSB recommendations in a superficial manner. This does not fully inform decision makers or the public about all of the significant adverse impacts of the project. The Final EIS must not repeat this error but must dive deeply into the CSB account of the 2010 incident, the state’s unresolved enforcement case against Tesoro, and the CSB’s recommendations.</p>	
Other-0969	Ruth Holder, Phillip Holder	<p>DEIS Makes No Progress toward Necessary Requirements for an Effective PSM Program:</p> <p>The DEIS underplayed the significance of and ignored the urgent need for a more effective Process Safety Management program over the life of the proposed project. The discussion in Appendix 2-</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information</p>

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		<p>A §2 describing the refinery’s current Process Safety Management program lacks sufficient information and detail for the DEIS, decision makers, or the public to reach any reasoned conclusion about the efficacy of the PSM program in reducing the risks and consequences of unplanned incidents. Indeed, the section raises as many questions as it purports to answer. For example, it contains broad generalities and references to “a variety of technical documents,” data bases, systems, written procedures, checklists, etc. neither made available to the reader nor analyzed for efficacy in the DEIS.</p> <p>DEIS Chapter 9 and Appendix 2-A summarize several modifications to Tesoro’s PSM program following the CSB Report on the 2010 fatal incident at Tesoro. While we appreciate that Tesoro has committed to developing new safety measures in response to the deaths of 7 employees and the subsequent CSB investigation, these assurances cannot be counted upon to avoid unsafe conditions and threats to employees, contractors, public health and the environment over the life of the project.</p> <p>The DEIS Chapter 9, inset on p. 9-28 describes three PSM elements that the DEIS says were modified by Applicant: process hazard analysis, damage mechanism hazard review and safety culture continuous improvement program. The DEIS further states: “[p]er recommendations from the U.S. Chemical Safety Board, Tesoro has developed a more robust process safety culture program... .” The DEIS failed to document and verify this statement. Appendix 2-A, §5.1.states:</p> <p>As a result of the incident, the CSB recommended that the state of Washington develop more rigorous requirements for process safety management and oversight, and for Tesoro to develop and implement a plan to meet these requirements. These requirements included, among others, improvements to the PHA (the updated program is discussed in Section 2.3), the Integrity Operating Window, and the damage mechanism hazard review programs and cross-linking among these three programs.</p> <p>Among other things, this quoted text from Appendix 2-A, §5.1 misstates the CSB’s recommendation. The recommendation</p>	<p>regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of this Final EIS.</p>

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		<p>concerning the cross-linking of three programs was directed specifically (and in detail) to Tesoro Refining & Marketing LLC. CSB Report §8.5, p 120. Moreover, the modifications to Tesoro’s PSM program as described in the DEIS, raise at least the following issues and questions that must be fully resolved in the FEIS. The modifications cited:</p> <p>? Have apparently not been completed to the satisfaction of the CSB; ? Represent only a subset of the CSB’s recommendations to achieve an effective PSM program; they do not demonstrate implementation of a comprehensive effective program; ? Are neither mandatory nor enforceable (the CSB has no regulatory or enforcement authority; the changes are not required by existing state regulations); ? Could be eliminated by changes in management, refinery ownership, or policy; ? May or may not be applied to each, every and all processes and equipment (new, expanded and existing) that would be used for the CPUP project; ? Do not demonstrably ensure an environment at Tesoro in which all employees and contract workers are empowered to take meaningful action to reduce or prevent incipient safety hazards; and ? May or may not apply over the life of the project.</p> <p>The DEIS inappropriately relied on these new measures to support its conclusion that the “public health” (including the facility’s workforce? See discussion above.) would be protected against two types of unplanned incidents - fires and spills. As discussed above, the DEIS - inappropriately and in disregard of WAC provisions - failed to include the full range of unplanned events in its analysis - explosions, fires, spills, leaks, upsets, and other releases of combustion products and toxic air contaminants into the air. The FEIS must include analysis of probable significant adverse impacts from all of these unplanned events.</p> <p>The DEIS assumed that safety program controls are in place without confirmation. The DEIS failed to examine the CSB’s Investigation Status Report regarding the new measures the DEIS relies upon to reach its conclusions about the revised PSM elements. The FEIS must not overlook the information in this Report. 7 [CSB. Tesoro Refinery Fatal Explosion and Fire, Investigation Status, Recommendations, various Recommendation</p>	

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		<p>Status Change Summaries. http://www.csb.gov/tesoro-refinery-fatal-explosion-and-fire/] In the Report the FEIS drafters will find that the CSB considers the safety culture survey oversight committee recommendation to remain unresolved and the recommendation for Tesoro Anacortes Refinery to implement a process safety culture continuous improvement program also remains “open” (unresolved). Tesoro represented that it would “issue a document describing the safety culture program and its implementation by December 31, 2015” after consultation with the United Steelworkers, U.S. EPA, and the Washington Department of Labor and Industries and that it would conduct its first safety culture survey in December of 2016. This item remains open and although Tesoro has “committed to the actions,” there is no indication the item has been finally resolved. The safety culture item for Tesoro Refining & Marketing also reveals that the safety culture recommendation is so far only the corporation’s stated “commitment,” and the item is still open.</p> <p>The recommendation for Tesoro Refining & Marketing and to “[r]evise and improve the Process Hazard Analysis (PHA), the Integrity Operating Window (IOW), and the damage mechanism hazard review (DMHR) programs and cross-linking among these three programs such that all identified hazards are effectively managed in each program” remains open and its resolution is dependent upon full implementation of the described changes and “documented completion of all the planned items.” As a result, the DEIS may have accepted on faith the Applicant’s “just trust us” approach but it failed to verify or document representations made about modifications to Tesoro’s safety program. Given these unresolved matters reflected in the Status Report, the FEIS cannot credibly assure decision makers and the public that there would be “less than significant” impacts to worker and community health and safety.</p> <p>Other elements of Tesoro’s PSM program listed in Appendix A-2 Section 2 track existing federal and Washington State PSM regulations found by the CSB to be inadequate to reduce risks or prevent them from arising in the first place. The existing state rules, Safety Standards for Process Safety Management of Highly</p>	

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		<p>Hazardous Chemicals Chapter 296-67 WAC, among other things, contain provisions, while at first blush may appear to be mandatory because they use the word, “shall”, are in reality permissive because the rules incorporate references to best practices documents that are written with advisory and permissive language “should” rather than the word “shall.” For example, hazards “should be” identified and controls “should be used” to reduce risk. Appendix C to these rules, Compliance Guidelines and Recommendations for Process Safety, is expressly non-mandatory. WAC 296-67-291. The CSB further found that the Washington Department of Labor and Industries lacked sufficient budget and expertise to conduct robust inspections and effectively enforce even the less than effective rules. When the FEIS drafter closely examines the CSB’s Investigation Status Report, as they must, they will find there has been no resolution of the recommendations for stronger state regulations or budget for a well-funded, well-staffed regulator.</p> <p>An Advisory Committee including petroleum refining industry and labor union representatives was created by the Washington Department of Labor and Industries (L&I) based on the CSB’s recommendations. Eventually arising from Committee meetings, L&I created a “stakeholder” group that also includes citizen representatives and some non-labor union refinery representatives. Over the past months this group has been engaged in a process of discussing the existing rules. A wide gap in regulatory philosophy between participants is evident at every meeting. Few agreements and no decisions have yet been reached and new rules provisions may or may not be developed or proposed that include all safety elements detailed in CSB’s recommendations. Meanwhile refinery safety remains subject to the federal and state rules and their enforcement that the CSB found ineffective to prevent deadly catastrophes like the 2010 Anacortes explosion and fire. The FEIS cannot reasonably rely on these rules to conclude that sufficient safety controls are in place to avoid significant adverse impacts.</p> <p>The CSB Report on the Tesoro 2010 incident included detailed recommendations for additions and improvements to refinery</p>	

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		<p>PSM programs. Very broadly summarized here but discussed thoroughly in the Report these include the following elements:</p> <ul style="list-style-type: none"> ? Inherently safer design practices to the greatest extent feasible to reduce risks to as low as reasonably possible (ALARP); ? Comprehensive and thoroughly documented Process Hazard Analysis that includes using hierarchy of control analysis to reduce risks to ALARP and uses structured methods, such as layer of protection analysis, to ensure adequate safeguards in process hazard analyses; ? Written performance indicators (including indicators that measure safety culture) made available to employees with measurable metrics to evaluate effectiveness in performance based safety systems; ? Periodic safety culture assessments including effective participation of the workforce and their representatives in the development of safety culture surveys and the implementation of corrective actions; ? Damage mechanism hazard reviews included in the process hazard analysis cycle; ? Root cause analyses after significant accidents or releases occur; and ? Written programs to account for human factors and organizational changes. <p>The CSB also recognized that in order to ensure effectiveness and enforceability of these program elements, worker participation in all PSM elements must be assured, with worker representatives selected by the workforce. The process safety culture assessment element must encourage employee and contract employee reporting of process safety concerns, near misses, injuries and incidents (and procedures must fully support worker shut down authority); ensure that reward or incentive programs do not undermine reporting, ensure that production pressures do not compromise process safety and promote effective process safety leadership at all levels. There is no demonstration in the DEIS assuring that Tesoro’s “safety culture” meets these standards or that it would be applied throughout all processes and process units (new, existing and expanded) for the CPUP project and over the life of the project.</p> <p>The DEIS lacks sufficient information to accurately determine the safety and health impacts from the proposed project resulting from a less than fully robust PSM program. The FEIS must not</p>	

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		<p>make this same mistake. To gain a greater understanding of the CSB's findings, recommendations, and status report and their applicability to this permit matter, the Skagit County PDS Department should consult with CSB investigators as called for by SEPA. WAC 197-11-335 (3) and SEPA FEIS Handbook §2.5.2.</p> <p>The DEIS ignored the state's enforcement case against Tesoro following the 2010 incident. The FEIS must include a discussion of the history and status of the unresolved enforcement case brought against Tesoro after the deadly 2010 incident by the Washington Department of Labor and Industries for 44 alleged violations (39 of which were classified as "willful," 5 as "serious") and seeking a proposed a fine of just under \$2.4 million. The Planning and Development Services Department should also consult with the Washington Department of Labor and Industries, Division of Occupational Safety and Health for information about this case as well as about the state's existing regulation of Process Safety Management standards.</p>	
Other-0970	Ruth Holder, Phillip Holder	<p>Conclusion:</p> <p>Prevention is Superior to Available Cures The time to ensure worker, community, and environmental safety at Tesoro is now. Given the size of this project and the process units and chemicals involved, this is an appropriate place to do so. The DEIS is inadequate because it fails to provide support for additional conditions or mitigation to ensure a robust and effective Process Safety Management program that would be applied to the CPUP project. This is unacceptable in light of Tesoro's track record on safety, the risks associated with the construction and operation of this project, and the CSB findings about the ineffectiveness of existing state and federal regulations. The Final EIS must correct this deficiency by fully examining the CSB's recommendations and ensure, point by point, that these recommendations will be facilitated throughout the CPUP project. The significant adverse impacts of this project cannot be avoided in the absence of permit conditions or mitigations that require a mandatory effective Process Safety Management program. Skagit County and its decision makers must not pass up this opportunity to improve the</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in</p>

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		<p>Tesoro facility's safety for the benefit of the workforce, their families and the broader Skagit community. Decision makers must require that all of the CSB recommendations are implemented for this project and require Tesoro to actively participate in and fully support the effort to make changes to state safety regulations that would implement all of the CSB's recommendations.</p>	<p>Table 2 in Section 3.1 of this Final EIS.</p> <p>Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of this Final EIS.</p>
Other-0971	James Nielson	<p>This will generate jobs and revenue. Jobs for clean-up crews, revenue for CEO's. I should know, I'm trained as a hazmat technician and have worked for NRCES aboard the Columbia. They are part of the multi-billion-dollar industry that exists solely because of the predictability of industrial disasters. And let me tell ya, we're not all that effective in ideal conditions, let alone in real life conditions.</p>	<p>Thank you for your comment.</p>
Other-0972	Mike Culley	<p>Safety is the number one priority of each job at the refinery -- each test we encounter -- and the result is the finest facility in the land.</p>	<p>Thank you for your comment.</p>
Other-0973	Erika Davis	<p>Many of the other commenters raise important considerations too, such as ...the less-than-pristine safety record of the company, and omissions from the draft EIS of critical information, just to name a few.</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6

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			<ul style="list-style-type: none"> • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-0974	Kenneth Bosworth	<p>Take the incident that occurred last year, when the chemical(benzene?) release caused multiple illness among the immediate neighbors! Why have they not monitored it better? Why did they cover up what had been answered by some workers and then refused to state what really happened? Why are there not more sensors for multiple chemicals that can pick up the 'chemical fume spill" ? Dollars should be invested right here in Anacortes !</p>	Thank you for your comment.
Other-0975	James M Strong	(10) In comparison to events (Canadian train explosion etc.) often used to try to block any new enterprise, US refinery and rail management in the Pacific Northwest appears to be cognizant of risks and can be expected to act in a responsible manner.	Thank you for your comment.
Other-0976	Phyllis Dolph	<p>The refinery in Anacortes does not have a good record for safety. An explosion in 2010 killed how many people? Shall we do that again only worse?</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety

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			management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0977	Phyllis Dolph	<p>[Image of Tesoro Refinery]</p> <p>Tesoro’s safety record</p> <p>A review by Sightline Institute [http://www.sightline.org/2014/07/10/the-dirt-on-tesoro/] of Tesoro’s safety record finds a checkered history, including persistent problems at the Golden Eagle Refinery in California (which would supply some of the reformate for xylene production), a deadly fire at the Anacortes Refinery, and a troubling pattern of withholding information from the public and regulators. The EIS should investigate this and eventually deny this project.</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0978	Michael Devirian	<p>I oppose the expansion of activities to include production and transport of xylene for the following reasons:</p> <p>Tesoro’s 2010 fatal refinery explosion and the refinery’s recent violation of the Clean Air Act raise questions about whether this refinery is prepared to safely manufacture and export xylene.</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p>

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			<p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0979	Jim Ciecko	<p>There is no mitigation offered for any of the potential hazards as it assumes that existing safety measures would be adequate despite a past history of major accidents at this refinery and refineries throughout the country. It would only take one accident to change the impacts of this proposal from "less than significant" to very significant.</p>	<p>One purpose of the EIS is to conduct a thorough review of the potential impacts related to the proposed project. Skagit County, as the lead agency, is overseeing the preparation of this EIS and is ensuring that applicable regulations and requirements under SEPA are followed, including permitting. A list of anticipated permits and approvals for the proposed project is provided in Table 1-1 in Section 1.4.5 of the Draft EIS. Additional information regarding the agencies responsible for regulating spills and unplanned events is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-0980	Jim lombard	<p>Preliminary: This refinery has not had a perfect track record for safety or compliance with environmental regulations (2010 explosion and recent Clean Air Act violations). This is very concerning considering the desire to add the manufacturing and/or export of Xylene.</p> <p>Solution: A full evaluation of the facilities safety procedures and manufacturing infrastructure should be included with the EIS to show that the facility is capable of producing and handling Xylene, and has procedures in place to mitigate the damage from a spill or other contamination.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the</p>

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Other-0981	Peter Englander	Do not proceed with this project. The Salish Sea is under extreme pressure with the risk of disaster from commercial activity carried out by irresponsible corporations who have not proven that they can manage and contain accidents from their operations	Thank you for your comment.
Other-0982	Curt Oppel	I have had close relations with Tesoro managers and employees over the last 25 years and i know that safety is their first priority.	Thank you for your comment.
Other-0983	Nancy Quackenbush	I am a concerned citizen who opposes Tesoro refinery's proposed project to export xylene to China. Tesoro's safety and environmental track record does not provide community confidence.	Thank you for your comment.
Other-0984	Janice Flinn	How can the xylene project even be considered with Tesoro's poor track record of disregard for safety of human life and quality of life for all Anacortes residents. I remember the terrible chemical smell from the 2010 explosion and I wasn't even downwind. What will Anacortes gain from allowing this xylene project to proceed? Who besides the company benefits from the production of this toxic chemical? Xylene is highly flammable. Tesoro's safety track record leads me to think that Tesoro is not competent in the processing of an additional chemical.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the</p>

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Other-0985	Janice Flinn	This is way too much responsibility for a company with a poor safety record.	Thank you for your comment.
Other-0986	Ronna Loerch	Finally – Tesoro does not have a great safety record in the past. This must be addressed in the final EIS	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7

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Other-0987	Mary Kanter	<p>The Tesoro “Clean Products Upgrade Project” (CPUP) is a dangerous proposal. With a known track record of violations, dangerous air pollution, and explosions it would be detrimental to the citizens of Washington especially for Fidalgo Bay. Tesoro’s Golden Eagle Xylene Refinery in California has included persistent problems and a troubling pattern of withholding information from the public and regulators.</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-0988	CG Wyatt	<p>7. Tesoro’s safety record finds a checkered history, including persistent problems at the Golden Eagle Refinery in California (which would supply some of the reformate for xylene production), a deadly fire at the Anacortes Refinery, and a troubling pattern of withholding information from the public and regulators.</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A

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Other-0989	Mary Ratermann	I am not impressed with the safety record of Tesoro, and recall the explosion at the Anacortes facility as well as the air quality violations and health impacts at other Tesoro facilities.	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0990	Janet StClair	With a known track record of violations, dangerous air pollution, and explosions it would be detrimental to the citizens of Anacortes and the environmental of Fidalgo Bay to allow expanded operations and even dirtier oil sources to roll through at increased rates. Tesoro’s Golden Eagle Xylene Refinery in California has included persistent problems and a troubling pattern of	The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices

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		withholding information from the public and regulators.	<p>accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-0991	Elisabeth Robson	Tesoro’s 2010 fatal refinery explosion and the refinery’s recent violation of the Clean Air Act raise questions about whether this refinery is prepared to safely manufacture and export xylene.	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill

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			response, and historical environmental and safety incidents – Appendix 2-A
Other-0992	Kathleen Lorence-Flanagan	5. Tesoro has a rather dismal safety record including “willful” violations in the 2010 Anacortes refinery fire. Only two violations are listed in the DEIS, it is well known that many more have occurred (and should be mentioned in the DEIS).	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0993	Virginia Wolff	<p>Refinery Safety Concerns The disaster at the Tesoro Anacortes refinery in 2010 left 7 people dead, caused serious damage, and shut down the refinery for months. Analysis by the Chemical Safety Board (CSB) cited 40 key findings, including deficiencies in the “process safety culture” a the Tesoro Anacortes Refinery, which “normalized the occurrences of hazardous conditions,” and need for stricter regulatory oversight by state agencies.</p> <p>http://www.csb.gov/assets/1/7/Tesoro_Anacortes_2014-May-01.pdf While Tesoro has made some changes to address problems which led to this disaster, many of the concerns raised by the Chemical Safety Board regarding the culture of safety at the</p>	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see</p>

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		<p>Tesoro Refinery remain unresolved.</p> <p>Efforts to improve regulatory oversight by Washington State have not yet happened. (See comment submitted by Mary Ruth Holder May 2, 2017 addressing Refinery Safety/Process Safety Management.) Not surprisingly, the CSB’s investigation of explosions at other refineries - Chevron’s Richmond Refinery in CA in 2012, and the ExxonMobile Refinery in Torrance, CA in 2015 - finds similar deficiencies in process safety management at all these refineries. http://www.csb.gov/csb-releases-finalreport-into-2015-explosion-at-exxonmobil-refinery-in-torrance-california/ This CPUP project introduces to the refinery and surrounding community potential exposure to new toxic, flammable chemicals, new processes not previously performed at the Tesoro refinery, and increases transport of dangerous substances in our waters. The Final EIS must mandate implementation of all condition and mitigations in the 2010 CSB findings and recommendations, point by point, with independent verification.</p>	<p>Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of this Final EIS.</p>
Other-0994	Orca Network, Howard Garrett	<p>Here are just a few ways this project would inevitably degrade the ecological productivity of the Salish Sea, thus harming orcas and human residents:</p> <ul style="list-style-type: none"> • Tesoro’s 2010 fatal refinery explosion and the refinery’s recent violation of the Clean Air Act raise questions about whether this refinery is prepared to safely manufacture and export xylene. 	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for worker health and safety is provided in Table 2 in</p>

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			Section 3.1 of this Final EIS.
Other-0995	Anne Winkes	<p>Adverse health impacts on the surrounding community and on refinery workers of a catastrophic accident occurring during the production and distribution of xylene:</p> <p>Though the DEIS assures us that Tesoro has adequate safety and emergency response plans in place if a catastrophic accident should occur during the production and shipping of xylene, Tesoro has a poor safety record.</p> <p>Following the 2010 fire at the Anacortes Tesoro refinery which killed 7 workers, the U.S. Chemical Safety and Hazard Investigation Board issued Recommendation 2010-08-1-WA- 15[18] to the Tesoro Anacortes Refinery. The recommendation instructs Tesoro to:</p> <p>"Implement a process safety culture continuous improvement program at the Tesoro Anacortes Refinery including a written procedure for periodic process safety culture surveys across the work force. The process safety culture program shall be overseen by a tripartite committee of Tesoro management, USW representatives, Washington State Department of Labor and Industries- Division of Occupational Safety and Health, and the U.S. Environmental Protection Agency. This oversight committee shall:</p> <ul style="list-style-type: none"> • a. Select an expert third party that will administer a periodic process safety culture survey; • b. Review and comment on the third party expert report developed from the survey; • c. Oversee the development and effective implementation of action items to address identified process safety culture issues; and • d. Develop process safety culture indicators to measure major accident prevention performance. <p>The process safety program shall include a focus on items that measure, at a minimum, willingness to report incidents, normalization of hazardous conditions, burden of proof of safety in plant process safety programs and practices, and management involvement and commitment to process safety. The periodic process safety culture report shall be made available to the plant workforce. The minimum frequency of process safety culture</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery currently has a process safety management program in place to prevent incidents and ensure safe operations (see Appendix 2-A of the Draft EIS). Tesoro would be required to make the proposed upgrades and operate the facility in accordance with a number of regulations and operations plans designed to protect the workers, as well as the environment, and human health.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional discussion is provided in Section 3.7.1 of this Final EIS. The Skagit County LEPC, mandated by EPCRA, is described in Table 2 of the Final EIS.</p> <p>Additional information regarding the agencies responsible for worker health and safety, human health, air emissions, and other environmental issues is provided in Table 2 in Section 3.1 of this Final EIS.</p>

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		<p>surveys shall be at least once every three years."</p> <p>The DEIS nowhere discusses in depth the above recommendations.</p> <p>The final EIS must analyze Tesoro's response to these recommendations as any failure on the part of Tesoro to follow these recommendations could result in a catastrophic accident that could adversely impact the health of surrounding communities as well as refinery workers.</p> <p>Recent refinery accidents have resulted in negative health impacts extending far beyond the fence lines of the involved refineries. According to an article in the 5/5/17 Skagit Valley Herald, "In February 2015, emissions from the Shell refinery blew into the Swinomish Indian Tribal Community reservation and LaConner, making many residents ill." An explosion at the Exxon Mobil refinery in Torrance, California on February 18, 2015 sent catalyst dust up to a mile away from the refinery into nearby neighborhoods.</p> <p>The Chemical Safety Board (CSB) released its findings on the 2015 ExxonMobil explosion on 5/4/2017. CSB Chairperson Vanessa Allen Sutherland said "The explosion and near miss should not have happened, and likely would not have happened, had a more robust process safety management system been in place." According to the CSB's report, "The refinery relied on safeguards that could not be verified, and re-used a previous procedure deviation without a sufficient hazard analysis the of current process conditions."</p> <p>The final EIS must analyze in depth Tesoro's process safety management system and verify that Tesoro is using all the recommended safeguards before considering granting a permit for the production of xylene. I agree completely with the scoping comment by Mary Ruth Holder and Philip Holder submitted via email and also hand delivered on 05/02/17 concerning process safety management.</p> <p>I agree completely with the Holders' conclusion that I have pasted in italics below:</p> <p>"The time to ensure worker, community, and environmental safety at Tesoro is now. Given the size of this project and the process</p>	

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		<p>units and chemicals involved, this is an appropriate place to do so. The DE IS is inadequate because it fails to provide support for additional conditions or mitigation to ensure a robust and effective Process Safety Management program that would be applied to the CPUP project. This is unacceptable in light of Tesoro's track record on safety, the risks associated with the construction and operation of this project, and the CSB findings about the ineffectiveness of existing state and federal regulations. The Final EIS must correct this deficiency by fully examining the CSB's recommendations and ensure, point by point, that these recommendations will be facilitated throughout the CPUP project. The significant adverse impacts of this project cannot be avoided in the absence of permit conditions or mitigations that require a mandatory effective Process Safety Management program. Skagit County and its decision makers must not pass up this opportunity to improve the Tesoro facility's safety for the benefit of the workforce, their families and the broader Skagit community. Decision makers must require that all of the CSB recommendations are implemented for this project and require Tesoro to actively participate in and fully support the effort to make changes to state safety regulations that would implement all of the CSB's recommendations."</p>	
Other-0996	Katherine Johnson	The safety record at Tesoro further increases my opposition to this project.	Thank you for your comment.
Other-0997	Barbara Tuttle	The final EIS should fully examine the Chemical Safety and Hazard Investigation Board's recommendations and ensure that these recommendations would be addressed throughout the planned upgrade.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p>

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Other-0998	Laurie Sherman	Tesoro has a questionable track record. Consider the 2010 fatal refinery explosion and the refinery's recent violation of the Clean Air Act. Is this refinery prepared to safely manufacture and export xylene?	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-0999	David Perk	The final Environmental Impact Statement should correct the following omissions from the draft version:	The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and

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		<p>Require Tesoro to follow the highest standards during the transport, refining and shipping of xylene, particularly in light of their past safety record in Anacortes and Golden Eagle Refinery, CA (Sightline Institute, The Dirt on Tesoro, http://www.sightline.org/download/48351/).</p>	<p>measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-1000	Anonymous	I know all about the Tesoro's record I know all about the 2010 fatal explosion.	Thank you for your comment.
Other-1001	United Steelworkers Local 12-591, George Welch, Gordon Zurn	<p>PROCESS SAFETY MANAGEMENT CONSIDERATIONS</p> <p>New equipment and control systems design should be determined using modern process safety concepts such as "Inherently Safer Design" and "Hierarchy of Controls Analysis" in order to reduce risk to "As Low as Reasonably Practicable" (ALARP). A more thorough review of these and other related process safety practices, the benefits of modern design, and capital investment, can be found in the Chemical Safety Boards (CSB) investigative report on the heat exchanger tragedy that took the lives of seven workers at the Tesoro refinery on April 2"d 2010. The report is here: http://www.csb.gov/tesororefinery-fatal-explosion-and-fire/ This document and others like it, that define the advantages of better process safety concepts, should be included as reference documents in the Final Environmental Impact Statement. We encourage regulators to confirm that these superior process safety</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro's safety program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS. Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A

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		practices have been applied to CPUP to ensure that worker and community safety are benefited to the fullest potential that such significant new capital spending presents.	<ul style="list-style-type: none"> • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training of Tesoro and local emergency service providers– Section 11.4
Other-1002	Camille Meehan	I'm concerned that with Tesoro has a history of accidents and can't be trusted to safeguard the Salish Sea. The fatal explosion at the refinery in 2010 is one such example of unsafe management.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1003	Robin Hirsch	<p>Tesoro should NOT be permitted to transport xylene on the Salish Sea for the following reasons:</p> <p>Tesoro's 2010 fatal refinery explosion and the refinery's recent violation of the Clean Air Act raise questions about whether this refinery is prepared to safely manufacture and export xylene.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section</p>

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			<p>3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1004	Teresa Catford	A few more jobs won't tip the scale in Tesoro's favor when on balance the negative consequences are so high:...3) Tesoro's safety record speaks for itself. This company is not a good neighbor and should not be allowed to expand into producing more toxic compounds like Xylene.	Thank you for your comment.
Other-1005	Jeanne Kleyn	Supposedly, the projects will add twenty new jobs but they will come at what might be a huge cost to the health of local residents and the health of our environment. Tesoro has a poor safety record. To give one pertinent example, in 2010, an explosion at the Anacortes plant sent a black plume of smoke over the town. Seven employees died. The Washington Department of Labor and Industries accused the company of willfully breaking the law 39 times. The scary thing is that Xylene is toxic. What will happen to employees and citizens the next time things go wrong?	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned

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			<p>events, including fires, explosions, and spills – Section 9.6</p> <ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1006	Vernon Lauridsen	Tesoro is not a good steward of the public trust as evidenced by the seven horrific deaths that occurred in 2010.	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1007	Ed Gastellum	In the investigative report into the the Tesoro Refinery explosion and fire, it states that Tesoro normalized some critical hazardous events at the refinery and instead of taking action and studying how best to fix the problems, seven innocent workers lost their lives to a process that could have been avoided. The fact that all recommendations from the report have not been acted on, says	Thank you for your comment.

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		that it is business as usual and employee safety is not the high priority that it should be.	
Other-1008	Margaret Kinsella	<p>I object to the project for several reasons:</p> <ul style="list-style-type: none"> - Tesoro has poor safety track record with 2010 fatal refinery explosion and recent violations of Clean Air Act. The latter shows Tesoro does not take safety protections seriously enough. 	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1009	Maggie Wilder	We have already experienced accidents that have impacted the public from this site. We don't want anymore	Thank you for your comment.
Other-1010	Louella Bergeson	Safety comes first at Tesoro! The Anacortes Tesoro Refinery was recognized for Distinguished Safety Achievements in 2015 by the American Fuel & Petroleum Manufacturers (AFPM). Our Tesoro Refinery was awarded the Elite Silver Safety, which recognizes the facilities' safety performance within the top 5 percent of the entire industry! They also celebrated another 12 months (3-31-15-3-31-16) with zero recordables, on March 31,2016. We all celebrated, even NFL legend Steve Largent came to help our Tesoro Refinery	Thank you for your comment.

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		celebrate the significant safety milestone. Safety is a daily priority for our Tesoro Refinery!	
Other-1011	Joline Betterndorf	<p>Tesoro's safety record should be examined and weighed against possible accidents or errors. Tesoro's violation of the treaty with the Swinomish indicates either arrogance or inattention or ineptness in management. Neither of these inspires confidence in the company's competence or assurances they are environmentally or socially responsible.</p> <p>I found no mention of penalties against the company, in case of unforeseen events, that would not be finally visited on consumers, not the company.</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7
Other-1012	Liz Amsden	<p>Tesoro has a really bad reputation in southern California. Their refinery is notorious for air pollution and toxic chemical leaks affecting local residents' health as well as for non-compliance with environmental laws and regulations.</p> <p>How will they do any better in Anacortes where their irresponsible stewardship will have devastating effect on the local eco-structure as well as on Americans and Canadians living in the area?</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety

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			<p>management, preventive measures and inspections, and oil spill response – Appendix 2-A</p> <ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>The proposed project’s emissions, comparison to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Potential impacts on air quality and preventive measures to help control air emissions are discussed in Section 4.4 of the Draft EIS.</p> <p>Additional information regarding the agencies responsible for regulating health and safety, air emissions, and other environmental compliance is provided in Table 2 in Section 3.1 of this Final EIS.</p>
Other-1013	ElsaMarie Butler	I live in Kent where, years ago, the Tesosro refinery was responsible for a toxic bloom that affected my neighborhood. There is a public service announcement on channel 22 entitled "Dirt Alert" in which families are warned to not allow their kids to dig on the dirt in this area!	Thank you for your comment.
Other-1014	Adele Zimmermann	GIVEN THE DEPLORABLE OVERALL SAFETY RECORD OF THE ENTIRE EXTRACTON/TRANSPORTATION/PROCESSING OF PETROLEUM, AND THE SHORTAGE OR SELECTIVE BLINDNESS OF INSPECTORS - THIS IS A HORRIBLE IDEA.	Thank you for your comment.
Other-1015	Twinkle Morton	The earlier explosion that killed workers appears to have come from less than the best materials which some choose to save the almighty dollar. This is short sighted and done far too often. I know that was in 2010 and I hope that all refinery businesses learned from that. It is a huge gamble to assume that though.	Thank you for your comment.

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Other-1016	Mary Ferm	<p>The refinery has already had a fairly recent explosion in which, as I recall, several workers were severely injured or killed. So it does not have a great record of safety on which to build an even more dangerous business.</p>	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1017	Kate Szurek	<p>I am an attorney, and I represented the families of many of the victims of the Tesoro explosion in 2010, as they probated the estates of their loved ones. (I was not part of the lawsuits.)</p> <p>In short, this question isn't philosophical or political for me. It is real. It has an impact on quality of life in our otherwise gorgeous community. And it represents the dangers of large scale industrial accidents.</p> <p>Please do not bring another dangerous chemical into my neighborhood. Please to not place at risk the working members of my community. Please do not drag toxic chemicals through the waters of Puget Sound.</p>	<p>Thank you for your comment.</p>

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Other-1018	Linda Vivas	Based on historical facts, it is clear that the energy industry has no concern for anything but their profits. Plus, they lie. They all lie about how many 'safety' features they have in case of an accident, then we find out they had very few. Then, taxpayers get stuck with the bill for cleanup.	Thank you for your comment.
Other-1019	Linda Vivas	READ the concerns below [from Form 9] as proof that Tesoro is only interested in lining their own pockets...the community and environment be damned. If a company is not interested in answering all safety concerns, they have no business receiving a permit to build anything, especially not in the state of Washington, where I live.	Thank you for your comment.
Other-1020	Frances Dodson	Anacortes has suffered the Shell Oil refinery explosion killing 12 people, and Puget Sound is in need of serious clean up already.	<p>The proposed project is at the Tesoro Anacortes Refinery. The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls– Section 2.8.5 • Potential impacts from unplanned events, including fires, explosions, and spills– Section 9.6 • Coordination and training of Tesoro and local emergency service providers– Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents– Appendix 2-A
Other-	Rachel Molloy	http://sanfrancisco.cbslocal.com/2016/07/18/tesoro-agrees-to-	Thank you for your comment.

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1021		spend-millions-in-air-pollution-settlement-with-u-s-epa/	
Other-1022	Rachel Molloy	http://komonews.com/news/local/epa-fines-tesoros-oil-refinery-in-anacortes-for-violations	Thank you for your comment.
Other-1023	Joe Chasse	I am a Coast Guard veteran (1965-70), and can tell you this refinery has NEVER been safe. It has ALWAYS been the one to cut corners and have/cause problems.	Thank you for your comment.
Other-1024	Erin Baker	http://sanfrancisco.cbslocal.com/2016/07/18/tesoro-agrees-to-spend-millions-in-air-pollution-settlement-with-u-s-epa/	Thank you for your comment.
Other-1025	Erin Baker	http://komonews.com/news/local/epa-fines-tesoros-oil-refinery-in-anacortes-for-violations	Thank you for your comment.
Other-1026	Vicki Thomas	Lastly, Sightline Institute's review of Tesoro's safety record shows a troubling history, including a deadly fire at the Anacortes Refinery and a pattern of withholding information from the public and regulators.	Thank you for your comment.
Other-1027	John Espe	Tesoro has already had a major explosion in 2010 that killed seven workers.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6

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			<ul style="list-style-type: none"> • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1028	Signature illegible, Gretchen Allison, Pam Coffey, Liza Michaelson, Lisa Nash Lawrence, Eric Ray, Daniel Tucker, Shann Westa	Make Tesoro prove that is can SAFELY manufacture and transport xylene they have already had on explosion! Why let them have another??	<p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro’s program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Tesoro conducts extensive emergency planning with local agencies (such as fire and police) and participates in community emergency planning organizations (such as the LEPC mandated by federal and state regulations); additional information is provided in Section 3.7.1 of this Final EIS.</p>

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			Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.
Other-1029	Kristin Fetters-Walp	heed the deadly Anacortes fire and the Golden Eagle refinery's polluting record.	<p>The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1030	Kristin Fetters-Walp	The company's track record of preventing spills is poor -- heed the deadly Anacortes fire and the Golden Eagle refinery's polluting record.	The refinery's past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the CSB, an independent safety board, analyzed Tesoro's program and recommended upgrades and additions. Additional information regarding Tesoro's safety improvements since the 2010 explosion and the status of CSB recommendations is provided in Section 3.6.3 of this Final EIS.

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			<p>Details about control measures and safety practices at the refinery in addition to those listed above are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls – Section 2.7.6 and Section 2.8.5 • Potential impacts and mitigation measures of unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A
Other-1031	Gunnel Clark	<p>Tesoro's safety record and transparency leaves a lot to be desired. This includes a persistent problems at the Golden Eagle Refinery in California (which would supply some of the reformat for xylene production), a deadly fire at the Anacortes Refinery, and a troubling pattern of withholding information from the public and regulators.</p>	<p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery's past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7

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Other-1032	Krys Schilling	I live near a refinery, there's sirens, it stinks, there's a bunch of times when things go wrong.	Thank you for your comment.
Other-1033	Peggy Bridgman	My son works for a contractor at the Shell refinery, and I am very concerned about his safety and health, just for starters.	Thank you for your comment.
Other-1034	Paul Fellows	The seriousness of this situation, particularly considering the past history of Tesoro accidents is of great concern.	Thank you for your comment.
Other-1035	James MacRae	There are more advanced and safer ways to produce fuel that are not fossil fuel related, and those options should be exercised. It is time to move beyond the "age of the typewriter" and into the age of the 21st Century. Given the evidence about green house gases on the environment, and life itself, we need to move towards sustainable, less polluting options, such as wind and solar power.	Thank you for your comment.
Other-1036	Leeza Broome	I strongly oppose Tesoro's plan for oil drilling off the coast of Anacortes. Many species, water, and food sources will be placed under further danger due to the risk of contamination. I urge you to view this article on the Salish Sea risks by the EPA. Thank you. https://www.epa.gov/salish-sea/marine-species-risk	The proposed project would not involve oil drilling. See Chapter 2 of the Draft EIS for the proposed project description.
Other-1037	Philo Wallis Lund	Here are some suggestions: 1) Why not transfer the coal and prilled sulfur directly to the ships at March's Point? It can not be efficient to use trucks roaring through downtown.	Thank you for your comment.
Other-1038	Philo Wallis Lund	Here are some suggestions: ... 3) Why not discontinue dealing with coal, a notoriously dirty fuel, when we needs must move to a cleaner processes?	Thank you for your comment.
Other-1039	Robin Everett	And if we do approve this project, let's start building clean energy here in Skagit Valley so that we can start having good jobs that we can all feel really excited and proud about.	Thank you for your comment.

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Other-1040	Patricia Resseguie	I oppose the Clean Products Upgrade Project at Tesoro. It s anything but "clean". The use of Bakken oil increases pollution from fracking.	Thank you for your comment.
Other-1041	Jill Rand	Tesoro’s Golden Eagle Xylene Refinery in California has included persistent problems and a troubling pattern of withholding information from the public and regulators.	Thank you for your comment.
Other-1042	Nancy Hansen	<p>One more very related issue to this entire project approval has to do with the increased fracking this project will generate. It means more methane, leading to more leaks of methane. If methane leaks, it also includes leaking of hydrocarbons, like benzene, a known carcinogen.</p> <p>More methane production will speed up global warming which is already being increased due to organic materials die off at low levels, due to drought.</p> <p>Methane does disappear in 10 years (vs. the 100 required to clean the atmosphere of CO2), but in the meantime, the heat-up could become so much increased to cause a tip-over along with catastrophic changes.</p> <p>Keep fossil fuels in the ground, the only answer.</p>	<p>The proposed project would not involve fracking. The proposed project requires the use of natural gas, supplied by Cascade Natural Gas, to operate the new steam boiler and the MVEC System. The new steam boiler was determined to be the most efficient way to provide the process heat needed for the proposed project. For further details on the use and supply of natural gas for the proposed project, see Section 8.4.2.3 of the Draft EIS.</p>
Other-1043	Sue O'Donnell	<p>My husband and I walk the beaches picking up garbage that washes in with every tide. One common thing to find is chunks of yellow plastic from busted up “Petro Barriers”. These are sometimes found intact but most often the stiff yellow/brown foam inside has washed out when the body of the thing is cracked open by wave action(?). We pick up and haul to the garbage can hunks of the foam and any size of yellow pieces of the roughly 8-inch x 6-inch x 18-inch yellow plastic casing with an opaque white “window” on one side. What are these used for? Does there need to be a “barrier” between what and what and whom? These “Petro Barriers” are so ubiquitous, one wonders what “Petro” products make them necessary. Is this a form of hazardous waste? Does the manufacturing process of these require Xylene??? These pieces of trash are all along the beach directly across from March’s</p>	<p>Petro Barrier is an oil containment boom and is a preventive measure to contain oil in the event of an incident while loading or unloading the vessel. Pre-booming around a vessel while loading or unloading light-end hydrocarbons such as xylene and reformates can create a safety hazard primarily associated with fire, and is not a viable control measure. Use of Petro Barriers is not specified as part of the proposed project. As such, their use in relation to the proposed project has not been considered in the Draft EIS.</p>

ID	Contact	Comment Text	Response
		Point.	
Other-1044	Pauline Druffel	<p>As I hear and read about the impacts the proposed coal export terminal would have, as identified in the EIS statement, I am struck by the immensity of the effects on all the people along the coal shipping routes as well as in the area of the terminal itself. I live close enough to the railroad here in Spokane to be able to watch the trains go across High Bridge as it crosses Latah Creek. I see how the coal cars are piled high with coal and I know the dust from that coal blows off the cars through the whole passage from where it is mined to where it ends at the terminal in Western Washington State. I'm aware that that coal dust also falls along the tracks and can act as a lubricant which destabilizes the tracks. We've had train derailments over time--another one in Northern Idaho just this past week. Fortunately the cars that derailed and tipped over there carried corn, not oil. Imagine the consequences if they had been oil tankers. I live in the Impact Zone if an oil train derailed near me in Spokane, so I am especially concerned about that safety issue.</p> <p>I understand that if the Tesoro Anacortes terminal project is approved, there would be 16 more mile-long unit trains of coal going (and coming) through Spokane each day. That would double the number currently going through Spokane, so the chances of twice as much coal dust coming off the trains.</p> <p>But coal dust is not the only issue related to 16 more coal trains coming through Spokane daily. There also is the traffic congestion at railroad crossings that are at road level. These crossings tend to be in the lower income neighborhoods. Probably the neighborhoods are lower income because people prefer to not live so close to trains coming through so frequently--especially when they carry dirty coal (or dangerous oil). Increasing the number of coal trains would diminish even further the livability and value of that land.</p> <p>The addition of so many mile-long trains would also further hinder First Responders as they have to cross the at-grade tracks in cases of emergency. Ambulances and Fire Engines have to get to help as</p>	The proposed project would not involve the shipment of coal via railroad or involve the construction of a coal export terminal.

ID	Contact	Comment Text	Response
		<p>quickly as possible.</p> <p>I also am very concerned about climate issues. We in Washington State are blessed by an administration which takes Global Warming seriously. This Millennium coal export project would increase the global greenhouse gas emissions by 2 million tons-- more than the whole state of Washington currently emits. How can we in conscience allow that to happen in order to ship coal to be burned in Asian from where green house gases then will come back to us. Another issue about this reality is that while China may be buying our coal now, they are also changing to alternative renewable energy at a fast rate. It is my prediction that by the time this terminal gets ready to use, China will no longer be interested in our coal and Anacortes would be left with this monstrous terminal and huge piles of coal with no-where to go.</p> <p>Advocates of the project name jobs as a reason to support it. In my opinion Millennium would be better served to use their current buildings to make the components for renewable energy and to increase jobs in that way. Meanwhile I'm aware of the jobs lost to local indigenous peoples who are impacted whenever our actions affect the quality of their fishing. Somehow we tend not to think of their rights, and yet they were here before us, and have just as much right to their economies as we do.</p> <p>There are other issues I could also address such as increase in cancer risk due to the diesel engines pulling the trains. One day as I looked out my window I saw a large plume of grey smoke rising up and was ready to call in a fire. Then I saw the the plume of smoke move in the direction of the train and I knew it was coming from the train. I've also heard doctors from here in Spokane testify to the effect on children breathing in the diesel fumes and having it exacerbate their asthma.</p>	
Other-1045	Raymond Williams	<p>5.1</p> <p>The rail cars proposed are very long; up to a mile or more in length. The impact to auto, truck and bus traffic in the affected cities, e.g., Spokane, have not been fully assessed. Also, the present rail traffic is also affected. Sidings must be properly</p>	<p>The proposed project would not involve the shipment of coal via railroad or involve the construction of a coal export terminal.</p>

ID	Contact	Comment Text	Response
		<p>managed and errors in judgment can result in accidents spilling tons of coal. There has be no mention of the type of equipment that will be necessary to do the cleanup in a timely and safe manner.</p> <p>5.2</p> <p>When working with hazardous materials, there are policies for "quantity and distance". The must be a prescribed distance from harm for a known quantity of material. The layout of the new area and the added rail usage adding more "quantity of material" but not "desistance". The safety assessment used data in the present to assure that the Railroad industry has the skills to protect the environment and safety of all. There has been no validation of this assessment.</p> <p>The present rail traffic has a defined safety record but the report extrapolated the data to cover the new use of the area and rails. Rail cars stay on the track if the load downward on the wheels remain higher than the vertical flange loads against the track generated by side loading. When trains add more cars to the locomotive, the flange loads start to rise in the leading cars when the train takes a curve. The wheels will climb out of the track if the lateral loads developed off-set the vertical loads on the wheel. The length of the these proposed coal trains offset the loads by providing pusher locomotives. This will work to mitigate the problem until there is a weakness in the track or road bed , or a mechanical or human failure to provide effective push.</p> <p>Remember, the locative pull is trying to straiten out the train as it pull through a curve. These repeated high loaded trains will work against the strength of the rail and road bed.</p> <p>The other no-controllable factor is the effects coal dust on the rail environment as it must be transported through populated areas. This impact is not well defined.</p>	
Other-1046	Robyn Hallonquist	I oppose the expansion of the Tesoro plant on March Point and would like the EIS to address the environmental impacts of extracting crude oil	The proposed project would not change the refinery's crude oil processing capacity, the capability to receive crude oil, or the method and number of crude oil deliveries via marine vessel, pipeline, or rail (see Chapter 2 of the Draft EIS for the proposed

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			project description).
Other-1047	Kenneth Bosworth	<p>Think where we would be today if the Reagan Administration had supported what President Carter had presented and worked on via the Solar Energy Research Institute of which Denis Hayes worked. The Chevrolet Volt was a wonderful development that was stopped within a year of being on the streets. Oil companies have made so much money that the stockholders, as well as CEO's, really do not know what to do with all the money. Oh they use it all right but it is usually socked away on some island so they do not pay taxes on it...etc.</p> <p>Our system needs to change!</p>	Thank you for your comment.
Other-1048	Rob Burnett	It is important that residents of the Salish Sea on both sides of the border resist any additional shipping traffic.... period. This includes the BC government's love affair with LNG and plans to ship LNG through the Salish Sea.	Thank you for your comment.
Other-1049	Mary Kanter	The proposal increases the use of Bakken Oil which comes from fracking, a process that is known by the EPA to pollute underground water sources and involves releasing more toxic air to process.	The proposed project would not involve fracking. A portion of the current fuel production would be diverted to xylene production. Operation of the proposed project would not change the crude oil processing capacity of the refinery, the capability of the refinery to receive crude oil, or the method and number of crude oil deliveries via marine vessel, pipeline, or rail.
Other-1050	Suzanne Myers	Canadian vessels also need to be denied throughway in our precious Salish Sea.	Thank you for your comment.
Other-1051	Joseph Heilgeist	Blowback, what you send to them so shall you receive! Why should the US send coal to countries that will turn this into pollution in the form carbon dioxide negatively effecting the climate change? The use of coal for energy is a dying industry placed on life support thanks to Trump and his ignorant supporters.	Thank you for your comment.
Other-1052	Pilchuck Audubon Society, Allen Gibbs	Having joined with other community groups in recent years in examining proposals by Shell to turn its refinery into a major	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>receiving and shipping point by rail, pipeline and marine transportation for processing Bakken oil, we are mindful that what presents threats to human life and public safety along the rail routes in Shell's proposals, we are looking at the same set of rail tracks and marine transport used by Tesoro. We don't see much difference between threats to human lives and the environment whether by sea or by rail of xylene, reformates and Bakken crude.</p>	
Other-1053	Wendy Bartlett	<p>We can do better. Tesoro and all fossil fuel industries, say no to fracking and pipelines that poison aquifers and water resources, the proven dangerous transporting of Bakken crude by rail (ask anyone along the Columbia River Basin in Oregon about the recent derailment and damages) and exploitation of fossil fuels.</p> <p>The future of our children, grandchildren, and this planet depends on it.</p>	Thank you for your comment.
Other-1054	Pam Bosch	<p>Besides solar and wind generation, Industrial Hemp could provide food, fuel, buildings with low embodied energy and low operational energy, could help reclaim polluted farmland, and at least a dozen other advantages that impact energy use, as well as public health and safety. Why is it that WA continues to fight this beneficial plant that citizen's want, while we have to beg our legislators and agencies to stop supporting proliferation of toxic substances?</p>	Thank you for your comment.
Other-1055	John Sarna	<p>A few years ago, and just a few miles from where I live, a pipeline ruptured and all but wiped out the neighborhood; as far as anyone knows, no one will be able to live there for who knows how long. And this rupture held none of the as-dangerous substances as does the Refinery's pipeline.</p>	Thank you for your comment.
Other-1056	Cheryl Dykstra	<p>Lastly, areas such as the Capital Region of New York, are already far too toxic as evidenced by its outrageously high cancer rates, most especially the hematological cancers found in young children in the area. To add any more toxins would constitute imposing a death sentence on the hard-working taxpayers and children who reside there.</p>	Thank you for your comment.

ID	Contact	Comment Text	Response
Other-1057	Amanda Sue Rudisill	And, [the proposed project] would mean a possible pathway for the refinery to increase oil train traffic and start shipping crude oil.	The proposed project would not include transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.
Other-1058	Dirk Vermeeren	<p>My wife and I recently retired from a 30 year career in the refining industry; we chose this part of the Pacific Northwest due to the natural beauty and quality of life it offers. We did not choose to live in communities associated with petrochemical industries since we had experienced that poor quality of life first hand.</p> <p>I would strongly encourage you to visit any of the petrochemical based communities of New Jersey, Texas and Louisiana in order to understand the negative affect on the local citizens.</p>	Thank you for your comment.
Other-1059	Dena Jensen	I live in Birch Bay, Washington, about a mile and a half from the Cherry Point Industrial Complex and BP Cherry Point, thus I travel in the crude-by-rail blast zone quite frequently and, in the case of an explosion, would, no matter what, be impacted by that event. There have been fires at the refinery there and I have experienced negative air and sound impacts from those events. Even in the day to day operations of the plant, especially in summer, I am exposed to very unpleasant smells that should be covered by nuisance ordinances and yet no fine or other action has been taken by the Northwest Clean Air Agency or the County. If I am experiencing these negative impacts from my distance (and ignorance of other things going on in the immediate vicinity of the plant), I can imagine that workers, land, air, waters, and life forms who are within and directly surround the refinery feel much greater impacts.	Thank you for your comment.
Other-1060	Dennis Barnes	When the Exxon Valdez oil liner wrecked and spilled oil into Prince William Sound in the mid-1980's, I worked for the consulting firm of Arthur Andersen & Co. which was then hired by Exxon to	Thank you for your comment.

ID	Contact	Comment Text	Response
		<p>determine the financial impact of the spill to the Alaska fishermen and reach settlements. Exxon promised to clean the sound and pay the fishermen. Twenty years later in the early 2000's I took my parents to visit Valdez where I lived as a child and they had homestead. Flipping over rocks you could still fine oil from the spill and the fishermen had still not been paid. Ten years later I read that Exxon had gotten a higher court to reduce in half what they had promised to pay fishermen so many years earlier.</p>	
Other-1061	Bobbee Murr	We demand solar energy everywhere!	Thank you for your comment.

Form Letter 1

ID	Comment Text	Response
Form 1	<p>As an employee at Tesoro’s March Point refinery, I would like to express my appreciation and support for the comprehensive Draft EIS (DEIS) that was completed by the County Planning Department’s employees and contractors.</p> <p>I believe the DEIS adequately describes and examines all the potential impacts of this project. Table ES-2 of the Executive Summary provides a comprehensible overview of all the main impacts and the associated mitigations.</p> <p>While the potential impacts to the environment and local resources are clearly described along with the planned prevention and mitigation measures, the positive aspects of the project don’t appear to be as prominently presented. Although mitigation isn’t necessary for the positive impacts, I believe they are important and should be considered.</p> <p>Some of the more significant positive impacts are:</p> <ul style="list-style-type: none"> • The Marine Vapor Emission Control Unit that will reduce wharf emissions by 95%. • The NHT expansion that will allow the refinery to meet Federal Tier 3 gasoline standards that require reduced levels of sulfur in the gasoline we produce. • The 20 new Full-Time local jobs with salaries that are significantly higher than the state and local average. • The product diversification which will enhance the long-term viability of the refinery by enabling it to produce new products that are used in manufacturing in addition the transportation fuels currently produced. • A significant investment that will result in increased tax revenue to multiple governmental jurisdictions. <p>I am proud to support this project and to work for a company that is willing to invest in the future of our community.</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

Allen, Jim	Davis, Jeff	Jessler, W	Padilla, Alex
Arseneau, Curt	DeBord, Seth	Johnson, Noel	Peterson, Keith
Baker, Robert W	Downie, Michael	Johnson, Scott W	Pierce, Hugh
Beaner, Steve	Dye, Mark	Jones, Bryce	Pilalis, Damon
Bergeson, Louella	Eastwood, [First name not provided]	Jones, Jeffrey	Robley, Shane
Boucher, Randy	Ellis, Greg W	Jordan, Jon	Rowls, Justin
Bouma, Chase	Elliser, Steven	King, Ryan	Saum, Susan
Brewer, Darick	Erickson, Thomas	Lively, Keith	Schwab, David
Bridges, Charles	Erickson, Wade	M, Scott	Sears, Sara
Bridgman, Beau	Fladgard, John	Malson, Jim	Smith, BA
Buma, Joel	Fluetsch, Sheila	Malson, Kaaren	Smith, Glenn
Burrougs, Walter	G, Jeff	Martinez, David	Stoker, Jared
Carlson, Lon	Gamman, Daniel	Mattson, Michael	Stragall, Isaiah
Cassidy, Kyle	Genther, Owen	McCardle, Crystal	Sullivan, Rodney
Chapman, Pete	Gercco, Steven	McClure, Michael	Swayze, Jeff
Christiansen, Henrik V	Hammock, Buck	Mehlum, Jason	Tautfest, James
Christiansen, Malia	Harting, Brent	Miller, Rob	Thompson, David
Clay, Bert	Hartman, Kyle	Miller, Steve	Tyler, Whit
Clemons, Rob	Hieronymus, Glenn	Morris, Thomas J	van Pelt, Mark
Cole, Kurt	Hildreth, Victoria	Mozes, Kal	Vervaart, Bill
Cusic, Mike	Holmes, Tiffany	Narin, Angel	Vine, Bob
Custer, Dave	Holmrust, Brian	Nora, Joseph	Walker, Jason
Dagostino, Dominic	Irish, Arthur E	Nystrom, Shon	Ware, Tony
Davis, Abraham	Jacks, Jeff	Ocheltree, Tim	Zeller, Michael
Davis, Austin	Jameson, Daniel	Oxford, Bryce	Zullo, Michael

Form Letter 2

ID	Comment Text	Response
Form 2	<p>I am writing to express my support for Tesoro’s Clean Products Upgrade Project (CPUP), and my enthusiasm for all of the benefits it will bring to Tesoro employees, like myself, and our community.</p> <p>As an employee of Tesoro, I am proud to contribute to the positive work my employer does for local families. Around here, Tesoro impacts almost every single person in our community; whether through a family member, friend or employer who does business with the refinery. The positive contributions Tesoro has made in our community are visible throughout the County. Over the last year, Tesoro invested over \$1 million in local clubs and organizations, such as the Boys and Girls Club, The Anacortes Family Center, Padilla Bay Foundation, Skagit DVSA and numerous local STEM education programs.</p> <p>After reviewing the Draft Environmental Impact Statement (DEIS) for the CPUP, I believe it is a comprehensive evaluation of the proposed project. I look forward to seeing this process move forward in favor of the project.</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

[Last name not provided], John	Davis, AJ	Kopkowski, James	Sieloff, Brad
Acosta, Marcus	Davis, Jeff	Loop, Adam	Smith, BA
Anderson, Barry	Dewitt, Jeff	Lottman, Lori	Stavany, Matt
Atchley, Dustin	Duplantis, Maxine	Marlowe, Jason	Stoker, Jared
Baker, Robert W	Forney, Jed	Mattson, Michael	Tanner, Ray D
Belisle, Russell	Gamman, Daniel	McCardle, Crystal	Thomas, Ryan
Boese, Rob	Gillett, Bruce H	McHenry, Ron	Thompson, David
Bradshaw, Beverly	Gray, Kevin	Nowakowski, John	Townshend, William
Breland, Matthew	Hammock, Buck	O’Neill, David	Vasquez, Jose
Bridgman, Tyler	Hess, Tom	Oppel, Curt	Vervaart, Bill
Brossard, Keith	Hollenberry, Jay	Peterson, Keith	Wilson, Charlie
Bryham, Monique	Hopley, Jonah	Phelan, Matthew	Wilson, Tucker
Bulin, Linda	Hors, Garrett	Poppe, Bill	Wondu, Bonnie
Burgler, Stephen L	Jansen, Arno	Post, Joseph	Wroblewski, Leon
Clay, Bert	Johnson, Scott W	Sasken, Dustin	Youngberg, Marc
Cusic, Mike	Kawashimn, David	Scott, James	Zimmerman, Terry
Davis, Abraham	Kell, Seth	Self, Eric	

Form Letter 3

ID	Comment Text	Response
Form 3	<p>I would like to express my support for Tesoro’s Clean Products Upgrade Project (CPUP).</p> <p>As an employee at Tesoro’s March Point refinery, I know firsthand the company’s commitment to the local environment. This project is an excellent example of Tesoro’s continued commitment.</p> <p>Although it’s not explicitly stated in the executive summary of the Draft EIS (DEIS), the new Marine Vapor Emission Control (MVEC) Unit will have a significant positive impact to the local air quality. For example, the installation of the MVEC will enable the refinery to reduce volatile organic compound emissions at the wharf by 95 percent. [or...by enabling the refinery to reduce volatile organic compound emissions at the wharf by 95 percent].</p> <p>The DEIS includes a close and comprehensive look at the project’s potential impacts of increased vessel traffic in the Salish Sea, and the associated spill risk. From the analysis in the Draft EIS, it is evident that the probability of a worst-case spill is “negligible.”</p> <p>I believe the DEIS is comprehensive and adequately considers all of the issues relevant to me and the community. I am proud to support this project and to work for a company that takes care of its employees and the local environment.</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

[Last name not provided], William	Cooper, Jermiah	Holmrust, Brian	Mozes, Kal	Sears, Sara
Acosta, Marcus	Cusic, Mike	Hsu, Ed	Mulder, James L	Simplot, Diane L
Agesen, Chris	Decker, Tony	Ilagan, Dextet	Nahoopii, Chantel	Smith, BA
Anderson, Cory D	Demes, Jeffrey J	Jin, Catherine	Nahoopii, Kawai	Smith, Trevor
Auner, Jonathan	Dubuque, Tyler	Johnson, Dave	Nelson, Roxann	Snyder, Robert
B, Arturo	Ellis, Greg W	Johnson, Scott W	Nispel, Sean	Soule, Justin
Barriga, Carlos	Evans, Johnny	Jones, Bryce	Nolen, Natalie	Steiner, Dana
Bennett, Kevin	Ewins, Diana	Kelley, Michael	Oppel, Monica	Sundine, Nathan
Blackstone, Steve	Forney, Seth	Kenote, Jim	Ostrowski, Bruce	Tanner, Ray D
Bowe, Don	Galbraith, Travis	Kowalczyk, Tory	Owens, Jason	Thompson, David
Bridges, Charles	Gardner, William	Lambe, Charles	Pearlman, Susan	Thompson, Sam
Brown, B	Gilbert, Matt	Lankford, James	Peterson, Keith	Tobin, Martin
Brune, Arron	H, Glenn	Lenzi, Michael	Protsman, Ryan	Tyra, Wes
Buew, Luis	Hall, Donald	Maitson, Gary	Rice, Brian	Vervaart, Bill
Bushong, Mike	Hammock, Buck	Marshall, Barb	Roth, Greg	Wagner, Luke
Chase, Shawn L	Harris, Edward	Mattson, Michael	Sanchez, Franco	Wilbur, Joseph
Colebourn, Edgar	Hawes, Daryl	Mecham, Brandon	Savage, Joe	Wilmore, Daniel

Form Letter 4

ID	Comment Text	Response
Form 4	<p>After reviewing the county’s Draft Environmental Impact Statement (DEIS) for Tesoro’s proposed Clean Products Upgrade Project (CPUP), I am writing to express my continued support for the project.</p> <p>I am an employee of Tesoro, and have enjoyed working for a company that creates so many opportunities and benefits for our area. Our refinery has been a steadfast member of Skagit County for over six decades, and this proposed project represents Tesoro’s continued commitment in our community. The CPUP is a clear sign of the company’s intention to continue investing in Skagit County. Upgrading the refinery’s equipment to provide cleaner burning fuels and lowering the refinery’s emissions at our marine wharf will provide long-term environmental benefits to the surrounding area.</p> <p>I believe the DEIS is a comprehensive review and addresses all the issues relevant to our community. I greatly appreciate the time the county put into creating this document for the public. I look forward to seeing this process progress and I urge the county to approve the project.</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

[Last name not provided], Ben	Gardner, Bill	Krystof, John	Richardson, Brandon
[Last name not provided], Gary	Gavew, Emmanuel	Laird, Kevin	Rios, Andres
Alford, Michael	Guethe, Mike	Lewis, Melinda	Rios, JoAnn
Anderson, Barry	Hammock, Buck	Maas, Chal	Roosendaal, Sandy
Anderson, Cory D	Hay, Dynele	Macy, Dylan	Sanchez, Franco
Armstrong, Joshua D	Hayes, Gabe	Mattson, Michael	Skarmounteos, George
Backstra, Robin	Haynes, Jayme	McCown, Zach	Smith, Lisa
Barmera, Deanna	Helms, Jacob	McGrew, Blake	Swenolt, Kevin
Bratt, Alex	Hill, Chris	McMickle, Theresa	Thomason, Justin
Brown, Nathan	Hill, Don	Nelson, Scott	Thompson, David
Burton, Josh	Hurlbert, Jeff	Pakinas, Joe	Thompson, Ryan
Clay, Bert	Johnson, Josh	Peterson, Keith	Traier, Jeff
Cusic, Mike	Johnson, Scott W	Pierce, Hugh	Vervaart, Bill
DeFrancesco, Lynn	Jordan, Jon	Pina, Hugo	Wagner, Luke
Delk, Shirley	Keel, Lester	Purcell, Matt	Wilder, Jeremiah

Form Letter 5

ID	Comment Text	Response
Form 5	<p>The Tesoro “Clean Products Upgrade Project” (CPUP) is anything but clean. With a known track record of violations, dangerous air pollution, and explosions it would be detrimental to the citizens of Anacortes and the environmental of Fidalgo Bay to allow expanded operations and even dirtier oil sources to roll through at increased rates. Tesoro’s Golden Eagle Xylene Refinery in California has included persistent problems and a troubling pattern of withholding information from the public and regulators.</p> <p>This increase in Bakken oil use (which comes from fracking, a process that is known by the EPA to pollute underground water sources and involves releasing more toxic air to process) and shipping traffic, means up to five extra tankers a month entering and exiting Fidalgo Bay. A new marine export terminal in addition to the oil rail terminal is only one step away from crude oil export being manipulated into our backyards and shared Salish waters.</p> <p>In addition, it is becoming increasingly clear that we are running out of time to address the reduction of carbon and greenhouse gas emission and air pollution in our atmosphere. According to NASA we have 4 years left to keep a global temperature rise below 1.5C, as we continue to see increasing ocean levels (which will also impact the safety and operation of this proposed marine terminal), and more severe storms (which may also impact the safety and operation of the refinery and the oil rail terminal in the form of more mudslides, more falling trees and more flooding). Expanding operations in fossil fuels at this time, exacerbates climate change in the near future.</p> <p>Please oppose this project and deny the permit. Thank you.</p>	<p>The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County.</p> <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. The refinery’s past safety history and measures implemented to address safety are discussed in Appendix 2-A of the Draft EIS. Tesoro reviews past incidents to identify lessons learned and update their safety practices accordingly. Details about control measures and safety practices at the refinery and along the marine vessel transportation route are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Construction site controls and operational site controls at the refinery and wharf – Sections 2.7.6 and 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A • Coordination and training between Tesoro and local emergency service providers – Section 11.4 • Spill likelihood and the potential for the increased vessel traffic to increase spill risks – Sections 13.5.6 and 13.6 • Vessel safety and waterway management – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformato into the marine environment – Section 13.5.7 <p>The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The proposed project’s emissions, comparison of these emissions to air quality standards, and planned emission controls are described in Chapter 4 of the Draft EIS. Emissions from new or modified sources at the facility are subject to regulations and permitting requirements under the authority of the NWCAA and Ecology. The proposed project requires emission control technologies that are designed to prevent air quality degradation and ensure compliance with health-based air quality standards. The Draft EIS discusses air emissions in the following</p>

ID	Comment Text	Response
		<p>sections:</p> <ul style="list-style-type: none"> • Vessel transportation and unloading criteria – Section 4.4.3 and Table 4-12 • Impacts on air quality and preventative measures – Section 4.4 • Impacts to human health – Section 9.3 and Section 9.6.2 <p>The proposed project’s new air emissions sources that emit GHG would have BACT installed to minimize GHG emission production (see Section 4.6 of the Draft EIS). These BACT selections include good combustion practices and the addition of the new components to the refinery leak detection and repair program. Additional information regarding GHG emissions is provided in Section 3.3 of this Final EIS. Information regarding agencies responsible for regulating the proposed project’s GHG and air quality emissions is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>Topography within the refinery boundary is discussed in Section 3.3.1.2 and the elevation of proposed project components in relation to sea level is discussed in Section 3.4.2.2 of the Draft EIS. Sea level rise in the Puget Sound and the potential impacts to proposed project infrastructure at the refinery are discussed in Section 4.8.1 of the Draft EIS.</p>

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

Baker, Erin
Howe, Jared
Iversen, Haifa

Molloy, Rachel
Schneiderhan, Cheryl

Form Letter 6

ID	Comment Text	Response
Form 6	<p>Tesoro refinery in Anacortes has proposed an expansion project that would increase the risk of a chemical spill in the Salish Sea.</p> <p>The “Clean Products Upgrade (CPU) Project” is a proposal to upgrade the refinery to produce and export xylene, a flammable petrochemical used to make plastic and synthetics.</p> <p>The plan to produce 15,000 barrels of xylene per day for export to Asia would bring an additional five tankers per month through the Salish Sea. Each additional tanker or barge in the Salish Sea compounds the already crowded shipping traffic and increases the risk of spills of crude oil and other refined products.</p> <p>What is xylene?</p> <p>Xylene is a flammable petrochemical used to make plastic and synthetic materials. It is also used as a solvent in the printing, rubber, paint, and leather industries. Xylene is created from a partially refined crude oil product called reformat that is often produced from light oil, such as Bakken shale oil. In addition to being highly flammable, xylene is toxic and clear, making it difficult to detect or clean up if spilled.</p> <p>Environmental impacts identified in the draft EIS:</p> <ul style="list-style-type: none"> Increased tanker traffic: The project would bring an additional 5 tankers per month (60 per year) through sensitive marine habitat in the San Juan Islands and the Salish Sea. These tankers would carry both reformat (a crude oil product used to produce xylene) and xylene. This is in addition to the 34 additional tankers PER MONTH proposed as part of the Kinder Morgan Trans Mountain Pipeline expansion. Increased spill risk: More tanker traffic means a higher risk of toxic spills. Washington state is not adequately prepared to respond to spills in the Salish Sea, which could cause irreparable damage to our sensitive marine habitat and threaten iconic species like our endangered southern resident orcas. 	<p>The name of the proposed project was supplied by the proponent on the application that was submitted to Skagit County. Details about the proposed project and the individual components are provided in Chapter 2 of the Draft EIS.</p> <p>The Draft EIS considered cumulative impacts from past, present, and reasonably foreseeable future actions for each resource analyzed in Chapters 3 through 13. Cumulative impacts were considered in accordance with SEPA provisions, which acknowledge that impacts may be direct, indirect, or cumulative (WAC 197-11-792(2)(c)). Cumulative impacts are changes to resources that could occur when the potential impacts of one project are considered in combination with impacts from other past, present, and reasonably foreseeable future actions (including other actual proposals and future proposals).</p> <p>In addition to the cumulative impacts discussed in each resource chapter, Table 1-2 in Section 1.7.2.2 of the Draft EIS provides a list of reasonably foreseeable future projects and actions that, in combination with the proposed project, could potentially result in cumulative impacts, including the Trans Mountain Pipeline Expansion. The Draft EIS analyzed the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions in Section 13.6. The potential impacts resulting from increased marine vessel traffic through the Salish Sea are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Air quality – Sections 4.4.3 and 4.4.4 Marine birds – Section 6.4.2 and 6.4.3 Special status terrestrial species – Section 6.5 Marine and nearshore resources, including the Southern Resident killer whale – Sections 7.4.2 and 7.4.3 Human health – Sections 9.3.2, 9.5.2, and 9.6.2 Land and shoreline use, recreation, and visual resources – Sections 10.3.2, 10.4.2, and 10.5.2 Public services – Section 11.4.2.4 Treaty and traditionally used resources – Section 11.5.2.3 Economics/employment income and tax receipts – Sections 11.5.2.4 and 11.6.2.2 Minority and low-income populations – Section 11.7.2 Cultural resources – Section 12.4.2 Vessel traffic , vessel safety, and marine spills and spill response – Sections 13.3.2, 13.4.2, and 13.5

ID	Comment Text	Response
	<p>[The following] are missing from the draft EIS:</p> <ul style="list-style-type: none"> Accurate calculations for carbon pollution: The draft EIS identifies a huge increase in air and climate pollution from ongoing operations for this project, while claiming unverifiable carbon offsets as mitigation. This pollution must be accurately calculated and mitigated to ensure Washington state can adequately meet its goals to act on climate change. <p>Draft EIS summary, page ES 19</p> <ul style="list-style-type: none"> Assurances the project won't increase crude oil train traffic: The Tesoro Anacortes refinery currently receives 4-5 crude oil trains per week. But the draft EIS doesn't examine the impact of these explosive trains traveling through our communities, and it doesn't require assurances that no increase in crude oil trains will be permitted in the future. <p>... include language in the final EIS that does the following:</p> <ol style="list-style-type: none"> Requires the highest standards during transport, refining and shipping of xylene Ensures refinery workers follow the highest safety standards and are protected from the risk of toxic xylene spills Creates an adequate disaster response plan with mitigation measures for water and air during a xylene spill at the refinery or from a tanker in the Salish Sea Prevents Tesoro from utilizing the upgrades to begin exporting crude oil without additional permits and an independent environmental impact assessment. Prevents Tesoro from increasing crude oil train traffic to the refinery to provide the products needed to create xylene. Fully offsets any increases in refinery pollution by specifically supporting mitigation projects in Northwest Washington. <p>Salish Sea threats</p> <p>Because xylene is clear and less dense than — so does not dissolve in — water, a xylene spill in the Salish Sea would be difficult to contain. The only known method for tracking the chemical is via air tests. The most common method of handling a xylene spill is to simply let the chemical evaporate from surface water over the</p>	<p>Spill prevention and response measures (response plans, equipment, and personnel) to both minimize the likelihood of a spill occurring and minimize potential impacts in the event of a spill are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> Construction site controls and operational site controls at the refinery and wharf – Section 2.7.6 and Section 2.8.5 Existing operations and controls, process safety management, preventive measures and inspections, and oil spill response – Appendix 2-A Vessel safety and waterway management – Section 13.4 Location of spill response equipment throughout the Puget Sound region – Figures 13-8 through 13-11 Spill response in the event of a release of mixed xylene or reformat into the marine environment – Section 13.5.7 <p>The refinery's spill prevention and response plans, including the spill prevention and control plan for spills at the refinery and the oil spill contingency plan for marine spills, would be modified to accommodate the proposed project. Requirements for the safe handling, transportation, and storage of mixed xylenes are administered by the USCG, Ecology, and USEPA. Laws, regulations, and guidance about safe handling and storage at the refinery are described in Section 3.1 and for marine transportation are described in Section 13.1 of the Draft EIS. See Section 13.5.7 for information on the suite of regional and local response plans and resources. Additional information regarding the agencies responsible for regulating marine transportation in the Salish Sea is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding vessel types, vessel traffic, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS.</p> <p>In the event of a spill, response organizations would be deployed to respond to the spill and minimize potential impacts. Mixed xylenes and reformat evaporate to the atmosphere and readily break down to less harmful compounds, specifically carbon dioxide and water, when exposed to sunlight. Because xylenes evaporate quickly and are flammable, the approach to manage a xylene spill in the marine environment does not involve containing the spilled material. Spill response measures consist of preventing the products from reaching sensitive areas by selective booming, ensuring there are no ignition sources as the evaporating products are flammable, and controlling access to the spill until the spilled material has evaporated or dissipated and air concentrations and fire hazards are safe. Unlike heavier oil spills, no chemicals are used in the cleanup of these types of product spills.</p> <p>Additional information regarding potential impacts is provided in the following sections of this Final EIS:</p>

ID	Comment Text	Response
	<p>course of several days, which is what happened when a tanker carrying xylene spilled 42,000 gallons into the Mississippi River in 2007. During that time, humans and animals exposed to xylene can face serious health threats by inhaling or ingesting the chemical. (Sightline Institute)</p> <p>Health impacts</p> <p>When inhaled or ingested, xylene can be moderately toxic to your central nervous system. Because xylene is less dense than — so does not dissolve in — water, human and animals are particularly prone to being impacted by a xylene spill on land or in the Salish Sea. The main health effects of inhaling xylene is depression of the central nervous system, with symptoms including headache, dizziness, nausea and vomiting. Long-term exposure may lead to short-term memory loss, among other effects. (National Institute of Health)</p> <p>Results of studies in animals indicate that large amounts of xylene can cause changes in the liver and harmful effects on the kidneys, lungs, heart, and nervous system. Short-term exposure to very high concentrations of xylene causes death in animals, as well as irritation and inflammation of the skin. (Agency for Toxic Substances and Disease Registry)</p> <p>Tesoro’s safety record</p> <p>A review by Sightline Institute of Tesoro’s safety record finds a checkered history, including persistent problems at the Golden Eagle Refinery in California (which would supply some of the reformate for xylene production), a deadly fire at the Anacortes Refinery, and a troubling pattern of withholding information from the public and regulators.</p>	<ul style="list-style-type: none"> • Air quality and climate change – Section 3.3 • Marine and nearshore resources – Section 3.5 • Environmental health – Section 3.6 • Marine transportation, including vessel traffic, marine spill modeling, likelihood and response – Section 3.9 <p>Proposed mitigation measures for this project’s GHG emissions are provided in Chapter 4 of this Final EIS.</p> <p>The proposed project would not increase transport of crude oil by rail; nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.</p> <p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, an independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>Details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training of Tesoro and local emergency service providers – Section 11.4

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

Benedict, Orion	Fetters-Walp, Kristin	Lunceford, Kate	Perk, David	Sygitowicz, Mikyn	White, Lael
Boyne, Jonathan	Harland, Donald	McConaughy, Marisa	Rabenstein, Lynn	Thomas, Vicki	Wineman, Marian
Clark, Gunnel	Jensen, Dena	McKim, Tina	Schoettler, Joanna	Tortorici, Francesco	
Cole, Joan	Johnson, Lorraine D	Mower, Amy	Schwinberg, Jean	Van Haalen, Teresa	
Erbs, Lori	Kilpatrick, Erin	Ness, Alan	Sharpe, Leslie	Wallach, Jess	

Form Letter 7

ID	Comment Text	Response
Form 7	<p>After reviewing the draft Environmental Impact Statement, I am writing to express my support for Tesoro’s Clean Products Upgrade Project that is currently under review. I believe the draft EIS is comprehensive and considers all of the issues relevant to our community.</p> <p>It’s not difficult to believe that Tesoro positively impacts the majority of people living in our local community. Maybe they’ve worked for the refinery, have friends or family working there, or work for a company doing business with the refinery. Many local stores, restaurants and other businesses in the area have been positively impacted by the refinery and its employees.</p> <p>Or, maybe their kids use the community and educational programs supported by Tesoro’s community giving -like the Boys and Girls Club of Skagit County, the local robotics teams or the Cascade Institute’s Mountain School. Last year alone, the Tesoro Foundation provided over \$1 million in funding to local organizations. They continue to be a committed and responsible investor in our community, our local programs and service organizations, and our local events.</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix..

Andrew, Philip	Houser, Courtney	Rytand, Nancy
Berg, Ryan	Johnson, Brian	Schinman, Kary
Bilkings, Roger	Johnson, C	Shelly, Adam
Bradford, E	Kelley, Pola	Spinnie, Dennis
Brown, Ashley	Lantz, Cassi	Swartzs, Sandy
Caldwell, Brenda	Martin, Donald W	Swint, David
Canapo, Richard	McGary, Brigitte	Taylor, Thomas A
Cooper, Scott	Morrison, Larry	Teela, Valeri
Cruise, Keana	Morrison, Billie-Jean	Thompson, Venn
DeLuca, Anthony	Nelson, Andrea	Vasiliy Fedoruk, Daniel
Dumas, Jacklyn	Paxon, Anya	Vickery, Charles
Englund, Adam	Pitts, Thomas	Warner, Eric
Exellby, Rob	Reeves, Riley	Zimmerman, Phillip
Harmon, Steve	Ruiz, George	
Holdt, Gavin	Rustad, Bruce	Sedro-Woolley Chamber of Commerce

Form Letter 8

ID	Comment Text	Response
Form 8	<p>I am writing to express my support for Tesoro’s Clean Products Upgrade Project. This project is the best way to keep our community strong by allowing Tesoro to diversify their business and invest in our community while protecting our environment.</p> <p>I support the project because the new products produced are already contained in the materials they use at the refinery every day and the diversification of the refinery will bring economic benefits to our community through new jobs and more tax revenue. As shown on page ES-3 of the draft EIS, mixed xylenes are used in many safe, every day household products. They’re sold in the paint section of the local hardware store, and are used to make a lot of the outdoor clothing we use here in the Pacific Northwest!</p> <p>I believe the draft EIS is very comprehensive and has provided important information on all the issues important to me and to our community. Thank for your consideration on this very important development project.</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

Aschim, Deanna J
 Barnard, John D
 Berg, Brett
 Bergeson, Richard
 Bruns, Frances J
 Childs, Victor
 Clasen, Patrick
 Cooper, Wilma D
 Dow, Kay
 Evans, Willy

Friend, Gary
 Goodman, Michael
 Hancken, Shar
 Henry, Graham
 Hutchins, Ernie
 Korgs, Rebecca
 Lemberg Ross, Linda
 Morrison, Donald
 Pritchett, Betty
 Rustad, Deanna Penny

Shaffer, Joyce
 Shelton, Randi
 Stoupa, Richard J
 Vervaart, Debra
 Walker, Meredith
 Welton, Laura
 Wilfer, Laurie
 Wingen, Dave

Form Letter 9

ID	Comment Text	Response
Form 9	<p>Thank you for the opportunity to provide comment on the Tesoro Refinery’s proposed expansion project. The DEIS does not demonstrate that Tesoro’s Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.</p> <p>Tesoro’s proposed project is really two different projects joined together which ought to be considered separately. I only support the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels.</p> <p>The DEIS does not include a thorough review of the safety requirements and full impacts of the project. I ask that the FEIS:</p> <ul style="list-style-type: none"> • Consult with NOAA in order to fully address the proposed project’s impacts to the state and federally listed as endangered Southern Resident Killer Whales, and identifies required mitigations for all project impacts; • Require a new NPDES permit in light of the significant increase in stormwater and new toxic chemicals; • Include a comprehensive vessel traffic and spill (of all cargos and propulsion fuels) assessment that analyzes all reasonably foreseeable future vessel traffic in the Salish Sea. • Include a comprehensive xylene production risk assessment based on incident and accident data from the Tesoro Anacortes Refinery; • Account for marine transportation impacts to WA State Ferries including the risk of disruption in service if there is a spill of any cargos and/or propulsion fuels; and • Require all project related laden tank vessels (of any size) to be escorted by tug(s) of sufficient power and 	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p> <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA’s <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project’s construction and operation phases (see Sections 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p> <p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer</p>

ID	Comment Text	Response
	<p>maneuverability to assure safe transit through the Salish Sea east of Port Angeles.</p> <p>Thanks for your time and attention.</p>	<p>system or the oily water system before being treated at the refinery’s wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery’s NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit.. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Additional information regarding marine transportation and spill modeling, including propulsion fuel spills, is provided in Section 3.9 of this Final EIS.</p> <p>If a spill were to occur along the marine vessel transportation route, the potential impacts to vessel traffic, including ferry service, are discussed in Section 13.3 of the Draft EIS.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using licensed Puget Sound pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

[Last name not provided], Andrew	Aguirre, Fran Ahaus, Kay	Ashley, Claudette Ashmun, August	Barry, Lynda Barth, Joline	Bircher, Kay Bires, Roy	Brinn, Ira Brock, Barbara
[Last name not provided], Cord	Ahern, Michael Aicone, Kim	Ashton, Lynne Askins, Susanna	Bartholomew, Carolyn Bartl, Alan	Bishop, Nancy Bitter, Linda	Brodahl, Jean Bromann, Jan
[Last name not provided], Fran	Albert, Anthony Alberts, Judith	Atkinson, Ellen Attemann, Rein	Bartlett, Faye Bartlett, Ray	Blackwell-Marchant, Pat Blair, W	Brookman, Gerald Brooks, Pat
[Last name not provided], Joanna	Aldort, Naomi Alexandra, Kathryn	Aulisio, Dominic Austin, Sam	Bassat, Candace R Bates, James	Blasco, Natalie Bledsoe, Cathy	Brouillette-Jobe, Sandra Brown, Gregory
[Last name not provided], John	Alexzander, Deborah Alic, Margaret	B, S B, Shary	Baud, Annick Bauman, Sarah	Blitzer, Mark D Bogie, Art	Brown, Keith Brown, Robert
[Last name not provided], Meuris	Alix, Virginie Allbee, Greg	Bachhuber, Stephen Bachman, Rose	Bayer, John Bear, S	Boisvert, Lisa Bolanos, Don	Brush-Hoover, Juliette Bruton, Babette
[Last name not provided], Nancy	Allbright, Galloway Alleger, Trevor	Bacorn, Thomas Bader-Nesse, Marilyn	Bear, Steve Beattie, Evan	Boliver, Emily Bonatti, Karen	Bryer, P Buck, Julia
[Last name not provided], Nick	Allen, Caroline Allen, Cathy	Baggs, Bo Bahn, Theodore	Beaudin, Erika Beavers, John	Bonfield, Barbara Boomhower, Deborah	Buechle, Alex Buer, Gro
[Last name not provided], Nicole	Allen, Dennis Allison, Connie	Bailey, Antonia Bailey, Dori	Beck, EA Becker, Elaine	Boone, Carolyn Boot, Patrick	Bull, Barbara Bultmann, Janice
[Last name not provided], Patricia	Alma, Shawn Alworth, Joan	Bailey, Meredith Bailey, Stephen	Beckwith, Mark Bell, Bryan	Bordeaux, Michelle Bordelon, Tika	Bunyard, Trish Burdette, Clinton
[Last Name Not Provided], R	Amory, James Amrod, David	Bails, Jean Bajwa, Ravinder	Bell, D Bell, Merriann	Bordenave, Michael Borgias, Elaine	Burgess, Barbara Burke, Heather
[Last name not provided], Richard	Amsden, Liz Anctil, Devin	Baker, Norman Baker, Patricia	Bendall, Georganne Benham, Mary	Borsy, Thomas Bostock, Vic	Burkhalter, Sheldon Burns, Susan
[Last Name Not Provided], RJ	Anderson, Kelley Anderson, Loretta	Baker, Sonia Baldwin, Natylie	Benson, Paul Bentley, Kathleen	Bosworth, Carol Bounds, Tyler	Burrows, Dara Burson, Sandra
[Last name not provided], Rosemary	Anderson, Mary Anderson, Matthew	Ball, Robert Ballard, John	Berger, Alex Berger, Karen	Bourne, Richard Box, Ken	Bush, Elizabeth Bush, Julie
[Last name not provided], Virginia	Anderson, Maureen Anderson, Rosanne	Bannerman, Lynne Barcott, Nick	Bergner, Richard Bergstrom, Bo	Bradford, Leslie Bradley, Kathy	Bush, Veronica Bushkoff, Paula
Abbott, G D	Anderson Beaulieu, Alex Andrade, Christian	Barger, John Barnes, Chris	Berliner, Diane Berman, Steven	Bradley, Mark Brault, Phyllis	Butler, ElsaMarie Bye, Susan
Abel, Teresa	Andrade, Lea Antonio, Beverly	Barnes, Noel Barnett, Claire	Bernthal, Tim Berto, Karen	Breakwell, Amy Breeze, Joanne	Byland, John Byrne, Charles
Abersold, Barbara	Anvari, Nancy Armstrong, Angela	Barrett, Donna Barrett, Fiona	Betourne, Susan Bevis, Vivian	Bremer, Jill Brennan, Judy	C, Elena C, Kristo
Ackroyd, Peter	Arntson, David Ash, Michelle	Barrett, Lisa Barrow, H	Bieker, Chris Bigelow, Paul	Brexel, Charles Brian, Prof	Caboose, Michael J Callen, Alex
Adams, Marsha					
Aere, Honora-Bright					
Affleck, Carol					
Agro, Joan					

Camaioni, Kaye	Clark, Todd	Cronin, Elizabeth	De Klyen, Thomas	Doran, Caitlin	Engel, Thomas
Campbell, Benita	Clark, W	Cronin, James	de la Rosa, Marco	Dorchin, Susan	Engel, Vianna
Campbell, Linda	Clement, WF	Crowe, Clark	De Vars, Rusty	Dorman, Shelbe	Enlow, Cynthia
Campbell, Liz	Clifford, Ruth	Crowley, Madeline	Dean Goss, Bonnie	Douglass, Sharon	Enright, Elizabeth
Canarsky, Maurine	Clinch, Farah	Cruz, Marian	Deardorff, Alyssa	Downing, Jean	Erbs, Lori
Cannon, Cynthia	Cloud, Jarrett	Crystal, Lakota	Dearing, Lynne	Dowson, Eleanor	Erickson, Scott
Cannon, Tom	Clymer, Jim	Cubbage, Nancy	Deerlyjohnson, Suzanne	Drake, Barb	Erickson, Steve
Canny, Maureen	Cobb, Sandra	Culbert, Laurette	deLancey, Kristin	Drees, Heth	Erlenborn, Daniel
Cantrell, Ina	Colangelo, Annapoorne	Cummings, George	Dellwo, Kathy	Dreyer, Sharyn	Esser, Char
Capestany, Annie	Coleman, Deanna	Cundy, Judy	DeLuca, Patricia	Drumright, Chris	Eugene, Bob
Capstick, Hilary	Coleman-Slack, Kelley	Cunningham, David	DeMarco, Joseph	Duda, Tim	Evenson, Marilyn
Cardwell, Kellie	Collins, Randall	Curia, Peter	DeMartin, Renee	Duffy, Kara	Evon, Debra
Carlson, Priscilla	Colson, Lynn	Curry, Donna	Denning, Daryl	Dukes, Aaron	F, Annette
Carmichael, John	Comella, John	Curry, Stephen	Densmore, Paul	Dumas, Marc	F, T
Carney, KC	Compton, Pete	Cusano, John	Derleth, Penny	Durbin, Stephen	Facey, Laurel
Carrington, Martha	Conlan, Mike	Dahl, Peter	Derout, Stephan	Durnell, Tim	Faford, Lorraine
Carson, Bob	Connolly, Kate	Dahlke, Dena	DeSantis, Amy	Dustrude, Eric	Fahlman, Cheryl
Cartwright, M	Conrad, Norm	Dahlke, Gloria	Detrick, Mary	Dwinell, Danny R	Fain, Glenn
Cassato, Candice	Cornelia, Jared	Dahmer, Karen	Deumling, Sarah	Dyakon, Douglas	Fairchild, Becca
Casteel, Jessie	Corrigan, James	Dale, Barbara	Deur, Tonia	Dykoski, William	Fairchild, Jennifer
Caswell, Gail	Cort, John	Dale, Jim	Devinney, Claudia	Earp, Marsha	Faithfull, Lucia
Caya, Jamie	Cosgrove, Eva	Daley, Suzann	Devlin, Felicity	Eastey, Sally	Fanrak, Martin
Cerise, Barbara	Couch, Sandra	Dallosto, Sarah	Dewey, Craig	Eddington, Marianne	Farhoud, Aisha
Cerny, Jayne	Covell, Sandi	Dampier, Jamie	Dick, Norman	Edmonston, Pandora	Farmer, LeRoy
Chadd, Edward	Cox, David	Darby, Elizabeth	Dickerson, Dianne	Edwards, Eric	Farrar, Susan
Chambless, Dorothy	Cox, Enid	Darcy, Kevin	Dickey, Kim	Effertz, Peter	Farrell, Bob
Chambless, John	Cox, Kim	Darden, Ruth	Dickinson, Amanda	Eggers, K	Fasnacht, Sharon
Chan, Guy	Cox, Susan	Darling, Carrie	Diehl, William	Egtvedt, Claire	Feichtinger, Dennis
Chang, Rebecca	Cox, Thomas	Darnell, Barbara	DiLabio, Gena	Eiesland, Diane	Feletar, Linda
Chapman, Bill	Cox-Carothers, Ruthanne	Darst, Dolores	DiMaria, Mark	Eisenberg, Paul	Feller, J
Charest, Doreen	Craft, Robin	Daub, Mary	Dixon, Marie	Eisenhower, Diane	Ferer, Shelley
Chaus, June	Craig, Melissa	Daugherty, Randall	Doane, Haven	Eldridge, Sara	Fergeson, Cheryl
Cheek, Madison	Crampton, Susan	Davidson, Heather	Dobson, Bruce	Elefson Morten, Evender	Ferguson, Brian
Chernow, Justin	Crane, Arlin	Davidson, Susan	Dodds, Margaret	Elkins, Anne	Ferm, Mary
Cherrington, Howard	Cranmer, Julia	Davis, Dorothy Jane	Dodson, Linda	Elkins, E	Ferraris, Alfred
Chor, Anthony	Cratty, Bruce	Davis, Jean	Doering, David	Ellingham, Nancy	Ferrito, Thomas J
Christopher, Sandra	Crawford, Kellie	Davison, William	Domke, Del	Elliott, Pamela	Fiedler, Ed
Ciuffo, Alice	Cresseveur, Jessica	Day, C	Domke, Ellen	Ellis, Kathryn	Fillmore, Jamie
Clark, Jenny	Creswell, Richard	Day, Edward	Dona, Ward	Ellman, Deborah	Fischoff, Robert
Clark, Lynn	Croasdale, Kathlene	Day, J	Donaldson, Jamie	Ellsworth, Joan	Fisher, Carla
Clark, Maxine	Crockett, Scott	Dayton, Gary	Donovan, Elaine	Elohim, Shemayim	Fisher, Karen

Fitzgerald, Stan	Garratt, Liz	Gotmer, Michael	Hahn, Julie	Haugen, David	Hoefner, Lisa Jean
Flores, Lupito	Garvey, Lydia	Gottberg, Dorothy	Hall, Jerilyn	Haugen, Monna	Hoffmann, Deborah
Fogan, Sara	Gastellum, Carolyn	Gottlieb, Olga S	Hall, Kathleen	Havel, Jerome	Holcomb, Peter
Follett, Pearl	Gatto, Gina	Grad, Brian	Hallberg, Joan	Haverfield, Heather	Holmberg, Daniel
Fontenot, MaryJo	Gazori, Shirley	Graffin, Jeanne	Haller, Maryann	Haverkamp, Kathy	Holmes, Katherine
Forshee, Helen	Genaze, Matthew	Grant, Margarette	Halligan, Sue	Hayden, Nancy	Holyk, Sherry
Fort, Carolyn	George, Diane	Graver, Chuck	Hallmark, Jena	Hayes, Scott	Homan, Peter
Fortunak, Sharon	Gerber, Jennifer	Greaves, Lee Ann	Hallonquist, Robyn	Heard, Elin	Honeycutt, Richard
Fradkin, Allison	Gerth, Jean	Gredvig, Mikkel	Hamer, Suzanne	Hearne, Leonard	Hong, Celeste
Frajola, F James	Gertig, Linda	Green, Arden	Hamilton, Jill	Heatherly, Margaret	Hoodwin, Marcia
Franco, Diana	Gervais, Anthony	Green, Catherine	Hance, Judith	Hedger, Lloyd	Hooper, William F
Frank, Sharon	Gibson, Jody	Green, Helene	Handford, Janet	Hedlin, Carol	Hopkins, Tom
Freels, Jeff	Giese, Mark	Green, Holly	Hanks, Laura	Hedwig Backman, Karen	Horner, Richard
Freeman, Richard C	Gilbert, Camille	Green, Jack	Hansen, James	Heffron, Josh	Houghtaling, Leonard
Freese, Carol	Gilbert, Carla	Green, Judith	Hanson, Natalie	Hein, Inez	Houston, Christie
French, James	Gilles, Lisa	Gregorian, Arthur	Hanson, Pam	Helen, Mary Helen	Howald, William
French, Nina	Gilman, Daniel	Gregory, Mandy	Hanson, Sarah	Heller, Lindsey	Howard, Karen
Freson, Neil	Gilman, Monica	Gregory, William	Haralam, Chris	Helmon, Mary Fay	Hubbard, Shaun
Friedman, Irwin	Gingras, Brian	Grieves, Kathy	Harband, Katherine	Hemphill, Patricia Joan	Huber, Jeremy
Friedrick, Stephen	Givot, Winnie	Griffin, Georgia	Harper, Alan	Hendershot, Carol	Huff, Constance
Friis, Rolf	Glasel, Deborah	Grinthal, Scott	Harpham, Jason	Henry, Mayellen	Hughes-Smith, Susan
Frost, Meghan	Glass, Deanna	Groeger, Tim	Harris, Donna	Hepfer, Anne	Hulbert, Dawn
Frostad, Tamara	Glasser, Mark	Groom, Kim	Harris, Frank	Hermann-Wu, Ailsa	Hull, Gary
Frye, Douglas	Glazer, Stephanie	Grove, Earl	Harris, Julie	Hermans, Colin O	Hull, Lise
Fuller Wilson, Sandra	Glebs, John E	Grove, Stephen	Harris, Louis	Hernandez, Candi	Hummel, Rochelle
Fursich, Rob	Glisson, Candie	Grzegorzewski, Mark	Harris, Pamela	Heron, Carrie	Hunt, David
G, C	Glover, Janet	Gudz, Betsy	Harrison, David	Herring, Patti	Hunt, Olivia
Gaff, Mal	Godzich, Mika	Guerrero, Peter	Harrison, Randy	Hess, Rachel	Huq, Rehana
Gale, Maradel	Gold, Carol	Guillory, Chris	Harrison, Sally	Heywood, Susan	Hurd, Julia
Gallagher, Kevin	Gold, Richard	Gundersen, Bruce	Hart, Sara	Hh, Nancy	Hurst, Darcia
Galvan, Jodie	Golding, Will	Gunther, Ken	Hartman, Stacie	Hickman, Elizabeth	Hurst, Eli
Gammon, Julia	Goldman, Steven	Gurche, Charles	Hartmann, Lorraine	Hieb, Laurel	Husby, Jason
Ganas Long, Jane	Goldman-Hull, Sergi	Guros, John	Hartsoch, Elizabeth	Higgins, Hollis	Husser, Norman
Gandolfo, Deborah	Goldsmith, Dell	Gustafson, Owen	Harvey, Jo	Hill, Patricia	Hussey, Peter
Gannon, Tim	Goodhart, Laurie	Guthrie, Elizabeth	Hasbach, Corinna	Hillman, Linda	Hutton, Joann
Gannon, Vicky	Goodman, Alice	Gutierrez, Emmylou	Hatcher, Cindy	Hiltner, Carol	Huynh, Kami
Garber, Carol	Goodwin, Greg	Gx, Perry	Hathaway, Arthur C	Himes, Erica	Hyun, Philip J
Gardner, Joy Lyn	Gorden, Gay	H, Brandon	Hathaway, Susan	Hines, Nancy	Imes, Roger
Garmon, Toni	Gordon, Jerilynn	H, F	Hatley, Noel	Hipp, James	Iovino, Teresa
Garner, Lynn	Gordon, Marianne	Haag, Ken	Hatmaker, Jayleen	Hirsch, Robin	Ira Kagan, David
Garofano, Tara	Goss, Alice	Haag, Mary Jo	Hatten, Rick	Hiser, Linda	Irwin, Christina

Ives, Pam	Johnston, Robert	Kickbusch, Sandra	LaPointe, Larry	Lewis, Vicki	Mabry, Jenna
Jack, Janice	Jolly, Brad	King, Christian	LaPorte, Candace	Libes Chester, Paula	Macgregor, Susan
Jacke, Dick	Jonach, Elizabeth	King, R Bruce	Larson, Dick	Lieberman, Sharon	Mach, Alex
Jacky, S J	Jones, Clayton	King Mlekarov, Noemia	Larson, R	Lienhard, Judith	MacRae, Diann
Jacob, Elizabeth	Jones, Helen	Kirsh, Julie	Larson, Wendy	Lima, C	MacRae, James
Jacobs, Anthony	Jones, Kyle	Klopp, Basey	Larue, Erik	Lind, M G	Macy, Michelle
Jacobs, Kathryn	Jones, Max	Knittle, Christa	LaSchiava, Dona	Linda, Lauren	Madrone, Sallie Rose
Jacobs, Nancy	Joy, Mark	Knoll, Linda	Lassalle, Kennith	Lindberg, Robert	Magid, Joseph
Jacoby, Jacqueline	K, C	Koch, Joann	Lawrence, Christopher	Lindeke, Lianne	Magliola, Lawrence
Jaehning, Jane	Kaemingk, Brooke	Kocher, Rustam	Laws, David	Linden, Susan	Magner, Millie
Jamal, Kate	Kaggen, Marilyn	Kocoras, Peggy	Lawson, Gene	Lindholdt, Paul	Magnotto, Luke
James, Brenda	Kallenbach, Cheryl	Koester, Martha	Leach, Karin	Lindsey, J J	Mahoney, Ann
James, Michelle	Kane, Brooke	Koger, James	Leavitt, Susan	Linzmeier, Robert	Malec, Catherine
James, Robert	Kane, Linda	Koiv, Ulle	LeBeau, Barry	Lionetti, Marc	Mallant, Lisa
Jancic, Mitchell	Kane, Pat	Koivisto, Ellen	Lebert, Mary	Lipman, Myrna	Mallin, Zy
Janer Villanueva, Marta	Kantor, Julie	Kolak, Paul	Lee, Brenda	Liu, Sue	Mallory, Jesse
Janetzke, Sherry	Kastner, Jenny	Kolakosky, Linda	Lee, Donald	Loera, Wolfgang	Maloff, Sandra
Jarrard, Sue	Katzin, Tam	Kollegger, Margaret	Lee Hawkins, Dixie	Loftness, Kim	Malone, Dawn
Jarvis, Karen	Kaufman, Ronald	Koller, Sue	Lee Miller, Claudia	Lombard, Stewart	Mamoyac, Joy
Jarvis, Marsha	Kavanaugh, Michael	Korneliussen, Vivian	Lee-Engel, Christy	Long, Laura	Mangum, V
Jastromb, Virginia	Keating, Michelle	Kosnar Hartman, Nancy	Lees, Brian	Long, Linda	Mangus, Tracey
Jean, Laquisha	Keckler, Jeanne	Kosowicz, Aleks	Lefaive, Julie	Long, Marilyn	Mann, Billie
Jeniker, Barbara	Keefe, George	Koterba, Frank	LeFort, Andrew	Longhom, Jill	Mann, Carrie
Jenkins, Brian	Keegan, William	Koury, Suzanne	Legan, Gayle	Longsworth, Jon	Manookian, Judith
Jenkins, Janell	Keeler, Timothy	Kovarik, Kerry	Lenardson, Denise	Longyear, Sharon	Maras, Matt
Jensen, Laura	Keeley, James	Kram, Ruth	Lenihan, C	Loosmore, Gwen	Marble, Nicole
Jensen, Victoria	Keenan, James	Krueger, Dennis	Lennick, BrendaLee	Loper, Matt	Margaret, Korshoj
Jeter, Randal	Kefgen, Kristi	Kruger, Suzanne	Lenski, Francis	Lopresto, Jeannine	Mari, Natalie
Johnsen, Jenet	Kegel, Erne	Krull, Valerie	Lenzen, Patricia A	Loucks, Dan	Marino, Amy
Johnson, Angelina	Keller, Bob	Krupinski, Keith	Leombruno, Steve	Low, Sammy	Maris, Shannon
Johnson, Ashlee	Kelley, Sheila	Kruse, Christina	Lepzelter, Howard	Lowe, Monitta	Markham, Drew
Johnson, Derek	Kelly, Angela	Kukovich, Kara	Letinich, Hannah	Loyland, Susan	Marks, Diane
Johnson, James	Kelly, Elizabeth	Kulhanek, Scott	Leurquin, T	Lucas, David	Marrs, Cynthia
Johnson, Lanie	Kelly, Karen	Kunze, Don	Leurquin, Tom	Lucky, Lorie	Marshall, Adam
Johnson, Lanni	Kelly, Lynne	Kwiatkowski, Wayne	LeVesque, Jeanette	Luther, Sue	Martin, Celia
Johnson, Lisa	Kelsey, Doris	Lague, Rich	Levin, Beth	Luxem, Dave	Martin, Connie
Johnson, Lorraine D	Kepner, Jane	Lahm, Brenda	Levine, Adam	Lyle, Audrey	Martin, Gayle
Johnson, Marla	Kersten Chalk, Sandra	Lambert, John	Levine, Rhoda	Lyman, Teresa	Martin, Jeanne
Johnson, Mary Lou	Kesich, John	Landon, Christine	Levy, Gad	Lyon, Jane A	Martin, King
Johnson, Richard	Kessinger, Jerry	Langford, Tytti	Lewis, Joyce	Lyons, Lorne A	Martin, Michael
Johnston, Lloyd	Kicinski, Hilda	Lapidus, Paul	Lewis, Verlene	Lyons, Michael	Martin, Roger

Martin, Ruth	McMath, Riley	Montapert, Anthony	Nelson, Barbara	Orr, Lou	Perkins, Jean
Martinez, Priscilla	McMullen, Evelyn	Moody, Peggy	Nelson, Bhavani Lorraine	Orr, Noel	Perkins, Lela
Martins, Isabel	McNeely, Tom	Moon, Sue	Nelson, Jennifer	Ostle, Marjorie	Peters, Nancy
Martinson, Julianne J	McNulty, John	Moore, Aaron	Nelson, Konnie	Ostrer, Allison	Peters, Thom
Marx, Michael	McVarish, Christine	Moore, Kerry	Nelson, MaryCarol	Ostrow, Hillary	Peterson, Annie
Marye-Baker, Taylor	Mead, Caroline	Moore, Larisa	Nelson, Teresa	Ottosen, Chris	Peterson, Chris
Maseda-Gille, Sheila	Meeks, Tyler	Morander, Kellyann	Nelson, Victoria	Oulman, Lynne	Peterson, Judy
Masotti, Katherine	Mehle, Anthony L	Morency, Claire	Nettleton, John	Oya, Kumi	Petrulias, Linda
Mass, Ursula	Meier, David	Moreno, H	Newton, Jan	P, A	Petzold, Ruth
Mastri, Francis	Messick, Scott	Morgan, Monique	Newton, Laura	P, E	Pfeiffer, Ben
Matchett, Holiday	Meyer, Carol	Morgan, Sarah	Nichols, Joe	P, S	Pfeiffer, William
Matera, Stephen	Meyer, Colonel	Morgan, Tess	Nichols, Stephen	Packard, Elaine	Pfost, Leslie
Matsui, Vicky	Meyer, Emily	Morgen, Joy	Nickerson, Sue	Padmanabhan, Urmila	Phillips, Anne
Mattke, Jean	Meyer, Paulette	Morijah, Heather	Nielsen, Therese	Pagan, Michael	Phillips, Frank
Maxwell, Lou Anne	Meyer, Robert	Morin, Carla	Niendorf, John	Paige, Melissa	Pierce, Charles
May, M	Michael, Kristin	Morris, Deirdre	Nightingale, Terry	Pantier, Gina	Pierson, James
Mazias, Melissa	Michaels, Brenda	Morrison, Bobby	Nihipali, Michele	Parcells, Patricia	Pierson Holding, Carol
Mccafferty, B	Michalek, David	Morten, Ann	Niles, Amanda	Parker, L	Pierucki, Gatha
McCain, Joe	Miler, Cathy	Morten, Doug	Nordby, Pat	Parker, Leah	Pilarski, Michael
McCarthy, Alice	Miller, Anna	Moser, Lynn	Nunez, Noris A	Parker, Michael	Pimentel, Llewellyn
McCaslin, Glenn	Miller, Bill	Moser, Rich	Nuttman, Judy	Parker, Stan	Pin, J
Mcclain, R	Miller, Charlene	Moyer, Julie	Nyberg, Levi	Parrish, Joan P	Pinc, Joseph
McClay, Scott	Miller, Diane	Moyer, Lee	O, Jesse	Parrish, Leslie	Pine, Lionel J
Mcclintock, Gloria	Miller, Jerry	Mrkvicka, Edward G	Oaks, Michael	Parrish, Mark	Pinneo, Janet
McCobb, Wendy	Miller, Lydia	Mukminov, Timur	Obershaw, Lynda	Parsley, Adina	Pitman, Shelley
McConaughy, Jeffery	Miller, Sharon	Mulcahey, Patrick	Obolsky, Lenny	Passabet, Nick	Poirier, Jeanne
McConkey, Kimberly	Miller, Travis	Muller, Catherine	Obrien, William	Paul, Dennis	Polda, Sarah
McConnell, Kelly	Miller, Victoria	Munoz, Giannelli	O'Brien, Beth	Pawtowski, Yvonne	Polish, Bret
McCuen, Annie	Milligan, Keith	Murdock, Lauren	O'Brien, Paula	Pearson, Tia	Pond, J
McCuen, Gary	Mills, Edward	Murphy, Cathern	O'Connor, Anne	Peha, David	Popoff, Dave
Mccutcheon, Meghan	Mills, Margaret	Murphy, Joanie	O'Hare, William	Peha, Julie	Popple, Glen
Mcdonald, Kimberly	Mills-Lott, Hayley	Murray, Chantel	Okada, Toni	Pekarcik, Diane	Porter, Barbara
McElhiney, Rebecca	Milnep, Linda	Murray, Linda	Olafson, Lynn	Pellegrino, Ron	Porter, Susan
Mcgarry, A	Miner, Ralph E	Murti, Gudrun	Oles, Mark	Pelton, Judy	Potter, Antonia
McGaughey, Mary	Misek, Jolie	Musick, Doug	Olmstead, Judy	Penaherrera, Roberto	Potts, Paul
McGovern, John	Mitchell, Bonnie	Myklestad, Erik	Olsen, Corey E	Penn, K	Power, Philip
McGowan, Wendy	Mitchell, Michelle	Myron, Sarah	Olson, Kim	Penney, Rob	Pratt, Debbi
McGrath, Joan	Mo, T	Naiman, Karen	O'Neal, Maureen	Penton, Toni	Prexl, Esther
Mchale, Dan	Mogg, Margaret	Naylor, Lucas	Oney, Shirley F	Pereira, Carolina	Price, Charlotte
McKelvie, Patricia	Monahan, Steven	Neevel, David	Orife, Rebecca	Perez, George	Primrose, John
McKeown, Dennis	Monk, Corinne	Neff, Grace	Orndorff, Kata	Perez, Janet	Prince, Steve

Prinz, Johni	Reznick, Jennifer	Rousu, Dwight	Schott, Rudy	Sherwood, Kate	Smoose, Jen
Prival, Bibi	Rice, Karol	Rowan, Christie	Schreibe, Anne	Shields, Deborah	Snyder, Valerie
Probart, David	Rich, Samantha	Rowe, Mary	Schroeder, Wendy	Shields, Janice	Soeldner, Walther
Provenzano, Amy	Richardson, Jean	Rowe, Penny	Schuchart, Lawrence	Shields, Juli	Sonett, Eric
Provost, Lin	Richardson, Will	Rubel, Scott	Schultz, Barbara	Shields, Sarah	Song, Angela
Quillian, Phoebe	Richardson, Willis	Rubiano, Linda	Schultz, Lesley	Shippee, Bob	Sovran, Vivian
Quinn, Tom	Richter, Karen	Rubin, Susan	Schultz, Lorenz	Shippen, Sallie	Spear, Debbie
Quirk, Joseph	Riggs, Madeline	Rudisill, Amanda Sue	Schwartz, Elizabeth	Shirey, Linda	Speck, Misty
Quistorff, Mary	Riley, Alan	Rudnick, Deborah	Schwartz, Marge	Shoemake, Gayla	Speed, Andrea
R, A	Riley, Callie	Ryan, Erin	Schwartz, Ronlyn A	Shook, Philip	Spencer, Jeremy
R, Jacob R	Riley, Joann	Ryan, Natalie	Schwellinger, Toni	Shuben, Jeffrey	Spencer, Sheila
Radford, Lemoine	Riley, Kelly	Ryder, Rita	Scott, Edward	Shuri, Frank	Spiegel, Kimberly
Radford, Sally	Riley, Mary	Ryland-Anderson, Anne	Scott, Nolen	Shuster, Marguerite	Spinazze, Bonnie
Rall, Ben	Rimbos, Peter	S, C	Scott, Raeann	Siegel, Melvin	Spradlin, Karen
Ramel, Alex	Ringgaard, Line	S, Kay	Scoville, James	Sielaff, David	St Martin, Darlene
Ramirez, Jessica	Rising, Melanie	S, Steve	Seigerschmidt, Barbara	Sigo, Lydia	Staats, Alycia
Ramon, Laura	Rittenhouse, Nancy	Saeji, CB	Sellars, Mary	Silverthorne, William	Stagi, Kathy
Ramos, Joann	Rivera, Robert	Sahm, Teri	Seltzer, Cheryl	Sim, Barbara	Stamos, James
Ramos, Miguel	Robbins, Teresa	Sailer, John	Seniuk, Susan	Simons, Lynne	Stanley, Carol
Randolph, Dee	Roberg, Kathryn	Sakura, Peter	Sennett, Mike	Sines, Charlotte	Stansfield, Jack
Rangel, Louise	Roberts, Les	Sanchez, Sierra	Senour, Dan	Singleton, Jon	Stapler Crowell, Maureen
Ranstrom, Patricia	Robins, Berkleee	Sands, Becky	Sercombe, Sarah	Sitnick, Joan	Staschik, Laurie
Rapplean, Tiffany M	Robins, Frankie	Sanfilippo, Val	Sewald, Michelle	Skeels, Kathleen	Stay, Chris
Rasmussen, Fraser	Robinson, Judith	Satin, Lisa	Sewell, Lauren	Skelton, Julie	Stead, Linda
Rathbun, P	Robson, Eric	Satterlee, Carol	Shaffer, Tomoko	Skelton, Laura	Stearns, Renee
Rauch, Marian	Rocco, Y	Sauls, Casey	Shafransky, Paula	Slaton, Christopher	Stebbins, Mary Louise
Rauworth, Steve	Rochkind, Iris	Saunders, Sharon	Shandler, Jalien	Slawinski, Katherine	Steele, Mary
Ray, Rick	Rocks, Brent	Savage, Patricia	Shanks, William	Slifka, Matthew	Stef, Rose Marie
Reade, Deborah	Roddis, Marya	Sayer, Fred	Sharlock, Leslie	Smith, Alan	Stein, Cindy
Reading, Toniann	Rodgers, Kimberly	Schanfald, Darlene	Sharp, Shari	Smith, Bradley	Stein, Ken
Redish, Maryellen	Rodgers, Sandra	Scheelen, Dolores	Sharpe, Leslie	Smith, Bruce	Steinhardt, Helene
Reed, Rita	Rogers, Matthew	Scheelen, Robert	Shaw, Nancy	Smith, Diane	Stephens, Jane
Rees, Hannah	Rogers, Pam	Scheer, David M	Sheahan, Maureen	Smith, Doug	Stern, Richard
Reeves, Richard	Rogers, Sherry	Scherer, Taen	Sheck, Sally	Smith, Karrie	Stevens, Zachary
Reilly, Jess	Rohrer, Roseanne	Schiffman, Jessica	Sheehan, John	Smith, Michael	Stevenson, Martha
Rennie, Silvia	Rojeski, Mary	Schlaffer, Runa	Sheldon, Sam	Smith, Mollie	Stewart, Margie
Resnick, Mark	Rolf, Margo	Schlatter, Jeanne	Shelman, Dave	Smith, Patti	Stewart, Peggy
Ressler, Sophia	Rome, Abigail	Schlemel, Pierre	Shenas, Mohsen	Smith, Richard	Stiehl, Joanna
Revord, Michael	Rooney-Katsma, Lynne	Schneller, Douglas	Shepherd, Marilyn	Smith, Sandra	Stillings, Lorrie
Reyes, Jesse	Rosenkotter, Barbara	Schogel, David	Sherman, Joanne	Smith, Wendy	Stirpe, D
Reynolds, Adele	Rothstein, Richard	Scholze, Karl	Sherman, Leslie	Smock, A	Stockman, Vivian

Stoeckel, Suzanne	Tetenbaum, Lawrence	Uiterwyk, Daniel	Warden, Patricia	Wilks, Andrew	Zabik, Joanne
Stohlman, Julie	Thach, Andrea	Umphred, Neal	Wasserman, Linda	Williams, Diane	Zaccagnino, David
Strain, Maryann G	Thale, Jim	Underwood, Dennis	Wathne, Lisa	Williams, Kathleen	Zack, Mary
Strawman, Tom	Thomas, Arthur	Uriarte, Ray	Watson, Hrold	Williams, Mara	Zaman-Zade, Rena
Strickland, Stacy	Thomas, Bob	Uyenishi, Steve	Wayne, Dorothy	Williamson, Jacqueline	Zarek, Elizabeth
Stringer, Matthew	Thomas, Kat	Uzuner, Selim	Weber, Brenda	Willoughby, Emily	Zarr, Debbie
Strong, Nancy	Thomas, Kathleen	Valdez, Donna	Wecker, Tamara	Willson, Jon	Zarter, Ellen
Struck, Fred	Thomas, Russ	van Alyne, Emily	Weed, Ardeth	Wilson, Dana	Zerr, Laura
Stucki, Elizabeth	Thomborson, B	Van Cleave, Berinda	Weidinger, Patricia	Wilson, Kathy	Zimmerman, Joni
Stusser, Suzanne	Thompson, T J	Van Haalen, Teresa	Weil, Susanne	Wilson, Patricia D	Zimmermann, Adele
Stutzman, C	Thorn, Debbie	van Helvoort, Heather	Weingart, Larry	Wilson, Sharon	Zucker, M Lee
Sullivan, Theresa	Thorne, Jan	Van Tassell, Robin	Weinstock, Jason	Wilson, Steve	Zurfluh, Paul
Surprenant, Delia	Thorward, Minda	Vandegrift, Debra	Weis, Marie	Wilson, Susan	
Svidler, Mariano	Thurairatnam, Susan	Varanitsa, Oleg	Weisman, Eleanor	Wilson, William	
Swadener, Ann	Timberlake, Ralph	Vartenuk, Cynthia	Weiss, Paul	Wineman, Marian	
Swanson, Susan	Timm, Jill	Vaulx-Smith, Wilford	Wenzl, Cristina	Winkel, David	
Swayne, Peggy	Todnem, David	Veith, Joachim	West, Eric	Witt, Kristen	
Sweeney, Constance	Tofflemire, Joanne	Verrill, Evelyn	West, G	Wittenborn, David	
Sweet, Selina	Tollefson, Todd	Versakos, Norma	West, Lisette	Wittmann, Suzanne	
Swiatkowski, Ray	Tomsky, Andy	Vesper, Paul	Westberg, Juanita	Woll, Margaret	
Swindler, Darece	Topp, Krista	Vieira, John	Westler, Jean A	Woller, Dakotah	
Swing, Rick	Torrie, Myrna	Vital, Sybille	Westphal, Heather	Wood, Antonia	
Syltebo, Tiffany	Townill, Linda	Vivas, Linda	Wexler, Jonathan	Woolpert, Steven	
Szekely, Todd	Townsend, Charles	Vodonos, Irina	Wexler, Marly	Worley, Donald	
Szilagyi, David	Townsend, Darlene	Volz, Candace	White, Austen	Worrell, Glen	
Szumlas, Nick	Travers, Mary	Voorhees, Tom	White, Bruce	Wozniak, Steve	
Szurek, Kate	Treadway, Carolyn	Vose, Virginia	White, Lois	Wray, Ted	
Takush, Kathie	Treppeda, Cassandra	Vyatchanin, Arkady	White, Maria	Wright, Carlyne	
Talcott, Diana	Triggs, Bob	W, L	White, Nancy	Wu, Blake	
Taylor, Brenna	Trione, David	Wade, Julie	White, Rob	Wyatt, Jennifer	
Taylor, Clinton	Troxell, Patricia	Wagner, Nancy H	White, Valery	Wyatt, Jill	
Taylor, Douglas	True, Mary	Wakefield, Marie	Whitefield, Donna	Wynne, Janet	
Taylor, George	Trueblood, Kathryn	Waldorf, Elizabeth	Whitehurst, Carol	Yanez, Guadalupe	
Taylor, Martha	Tucker, Rebecca	Wales, Ann	Whiteside, Catherine	Yeilding, Nancy	
Taylor, Mason	Tulys, Walter	Wall, Lonnie	Whiting, Janice	Yoder, Amanda	
Taylor, Polly	Tuminski, Elizabeth	Wallace, Margy	Wiant, Jean	Youd, Mark	
Taylor, Stephanie	Tuminski, Robert	Wallace, Nadine	Wichar, Den Mark	Young, Mary	
Teach, Jean	Turner, Laurel	Waltasti, Marilyn	Wiederhold, Joe	Young, William	
Tedesco-Kerrick, Terry	Twiggs, Michael	Walter, Amy	Wienart, John	Younger, Lyn	
Teed, Cornelia	Tylczak, Katherine Alice	Walters, Ernie	Wilhelm, George	Youngers, Otto	
Teevan, John	Tyndall, Carl	Ward, Patricia	Wilkie, Susan	Youngs, Linda	

Form Letter 10

ID	Comment Text	Response
Form 10	<p>Thank you for the opportunity to provide comment on the Tesoro Refinery’s proposed expansion project. The DEIS does not demonstrate that Tesoro’s Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous, and noxious substance. The threats that this project poses to our climate, the Salish Sea and the surrounding community make it clear that this project should not be permitted as proposed.</p> <p>Tesoro’s proposed project is really two different projects joined together which ought to be considered separately. I only support the elements necessary to comply with Clean Air Act requirements and reduce sulfur content of their fuels.</p> <p>The DEIS does not include a thorough review of the safety requirements and full impacts of the project. I ask that the FEIS:</p> <ul style="list-style-type: none"> • Consider a project alternative that only includes the production of lower sulfur fuels and the clean air components of the project (without the production and export of xylenes); • Account fully for all greenhouse gas emissions. Any mitigation or offsets should demonstrate that the reduction is real, verifiable, is additional and that it will be permanent and enforceable; • Evaluate the impacts to worker health and safety and includes protection for worker health and safety by fully supporting and implementing all conditions and mitigations the 2010 Chemical Safety Board findings and recommendations on a point-by-point basis with independent verification; • Impose binding mitigation to ensure that the project will not pave the way for any increase in Tesoro’s use of oil trains above current levels; • Require a shoreline conditional use permit to limit Tesoro’s uses for crude oil loading for transport or export. <p>Thanks for your time and attention.</p>	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project (see Section 1.2 for a description of the purpose and need). The SEPA Rules (WAC 197-11-402(1)) require the lead agency to analyze only reasonable alternatives when preparing an EIS. Reasonable alternatives are defined as actions that could feasibly attain or approximate a proposal’s objectives (WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p> <p>Additional information regarding the proposed project’s GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions that Tesoro has implemented. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents.</p> <p>Further details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training of Tesoro and local emergency service providers – Section 11.4

ID	Comment Text	Response
		The proposed project would not increase transport of crude oil by rail nor would it include export of crude oil from the Tesoro Refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with transport of crude oil to the Tesoro Refinery by rail or associated with the export of crude oil were not analyzed in this EIS and would not be authorized under permits issued for the proposed project.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

A, Maggie	Alterman, Deborah	Bahr, Dennis	Becker, Kathleen	Bini, Katherine C	Bowdish, Caroline
Abbott, G D	Alvarez, Vincent	Bailey, Brenda	Becknel, Nan	Bird, Stoney	Bowe, Nicola
Aberman, Kathie	Anderson, Glen	Bain, Diana	Bedirian, George	Bishop, Cori	Bowers, Joan
Abernathy, Gina	Anderson, James	Bainbridge, Mary-Lynne	Beers, William	Bishop, Scott	Bowlby, Ed
Abrams, Sally	Anderson, Kathryn	Baine, Dave	Beitel, Timothy	Bissell, Mary	Bowman, Brian
Achman, Gary	Anderson, Matthew	Baker, Arlene	Bell, Sheryl	Blackadder, Nancy	Bowman, Wendy
Acker, Michael	Anderson, Ray	Baker, Lauren	Bena-Weber, Ananda	Blackmun, Chelcie	Boyce, Janice
Adams, Deborah	Anderson, Rosanne	Baker, Norman	Bennett, Donna	Blair, Judy	Boyce, Thomas
Adams, Marsha	Anderson, Scott	Balassi, Nancy	Bennett, Ed	Bloom, Diane	Boyd, Marilyn
Aebly, Monica	Andreas, Sonja	Baldwin, Carol	Bennett, Gary	Blum, Stuart	Boylston, Sandra
Agnelli, Donald	Andrews, Becky	Baldwin, Gordon Philip	Bennett, Paula	Blumenthal, Robert	Boyne, Jonathan
Ague, Kate	Andrychowski, Steven	Baley, Patricia	Bennett, Ted	Bodden, William	Brace, Stephen
Aiken, Thomas	Angel, Shanna	Balles, Katherin	Bennington, Mary Lou	Bogie, Art	Bradford, Russell
Ainsley, Brian	Anicker, Diane	Baltin, Brian	Bensinger, Irene	Boguske, Matthew	Bradley, Mark
Airoidi, Sara	Arden, Llewellyne	Barger, Sarah	Bentley, Cynthia	Bohannon, Todd	Bradley, Marya
Alayza Mujica, Bernardo	Arent, Raymond	Barile, A	Berkelhammer, Jessi	Bolanos, Don	Bradshaw, Elizabeth
Alfaro, Elaine	Armstrong, Angela	Barlow, Scott	Berlant, Rebecca	Bollert, Bruce	Brady, Howard
Alfus, Gavin	Ashton, Richard	Barmann, Matthew	Bernat, Ric	Bonetti, Donna	Brandt, Cathy
Algiere, Steve	Asmus, Sigrid	Barreca, Joseph	Berolzheimer, Jean	Boni, Taiya	Brant, Daniel
Allan, Chris	Asturino, Frank	Barron, Jane	Berry, Suzanne	Bonine, Bruce	Brassel, S
Allen, Brian	Atkinson, Jay	Barsky, Phillip	Berton, Cara	Bonney, Christine	Brayshaw, Julia
Allen, Judith	Attapattu, Jeevake	Bartholomew, Emma	Besmer, Kelly	Bookheimer, Donna	Brazitis, Peter
Allen, Linda	Aul, Greta	Bartkoski, Joanne	Beves, Peter	Borame, Joan	Bremer, Jill
Allen, Nathan	Award, Beth	Bartlett, Raymond	Bhakti, Sara	Bordelon, Tika	Bremer, John
Allen, Stephanie	Ayers, Frank	Baruch, Duncan	Bicknell, Sarah	Bornholtz, Gavin	Brennan, Judy
Allen, Teresa	B, Shary	Bayer, John	Bierbaum, Rebecca	Borso, Pamela	Brewer, Ginger
Alper, Sarah	Bach, Julie	Beatini, Tom	Biermann, Christine	Bost'n, Judae	Bricker, Korinne
Altenhof-Long, Cameron	Bachelder, Karen	Beaven, Jane	Bill, Susan	Boswell, Norma	Britton, Craig

Brod, Jane	Burnett, Gerald	Chadsey, Meg	Colliander, Kelsey	Crotty, John	Davis, Virginia
Brogan, Jessica	Burnham, Elma	Chafee, Donetta	Collier, Mary	Crowley, Lawrence	Davison, William
Brooks, Rebecca	Burrows, Beth	Chambless, Dorothy	Collins, Jim	Crowley, Madeline	Dawson, G
Broome, Leeza	Burrows, Dara	Charrier, JL	Collins, Paul	Crowley, Marty	De Cecco, Jorge
Brouillette-Jobe, Sandra	Burrows, John	Chartier, Nanci	Collins, Wilfred	Cruger, Kurt	De Moor, Vera
Brown, Alan	Burrows, Richard	Chasse, Joe	Colson, Lynn	Cruz, Marina	de Wielle, Karin
Brown, April Sue	Bush, Anne	Chastain, LeeAnn	Colter, Carolee	Csaszar, John	Deal, Brandie
Brown, Deb	Busher, Sharmayne	Chatel, Donna	Colton, Jeff	Culbert, Laurette	Dean, Sue E
Brown, Doug	Bushur, Mary	Chesick, Katherine	Comfort, Thomas	Cumming, Malcolm	Deardorff, Glen
Brown, Kris	Butterfield, Lois	Chessin, Meta	Compton, Kathryn	Cummings, Mike	Deaton, Mary
Brown, Louise	Byrnes, Mary	Chodorow, J	Condit, Stephen	Cunningham, Colleen	DeBolt, Eric
Brown, Michael	C, Haven	Chopyak, Anne	Conlan, Mike	Cunningham, Elizabeth	Dees, Dorothy
Brown, Sabrina	C, Rich	Christian, Steven	Conlee, Mary Beth	Curry, Linda	DeFalco, Tony
Brown, Terry	Calgar, Damon	Christopherson, Patricia	Conlin, Michele	Curry, Stephen	Defatta, Jude
Brown, Vera	Calkins, Christopher	Chu, J	Conn, Sharon	D, G	Delatorre-Hansen, Isabel
Browne, Mary	Campbell, Candace	Cibery, John	Connon, Alec	Daggett, Johanna	Delmar, Roger
Bruce, Felicia	Campbell, Dudley	Cirigliano, Jane	Cook, Carol	Dale, Felicia	DeMers, Douglas
Brucker, Bob	Campbell, Fred	Citazen Pariah Serwer,	Cook, Jacqueline	Dalland, Inge	Demetre, Victoria
Brueckner, Barbara	Campbell, Liz	Jeremy	Cook, Jonathan	Damarjian, Christine	Dengler, Kurtis
Brumwell, Keith	Campbell, Shirley	Clark, Julianne	Cook, Suzanne	D'Amico, Margaret	Denham, Jessica
Brundage, Lucy	Canar, Lisa	Clark, Maxine	Cook, William	Danford, M	Derleth, Penny
Brunkow, James	Cannell, David	Clark, Rebecca	Cooley, Paula	Daniel, Marc	Desantis, Megan
Brunton, Beth	Canter, M	Clarke, Len	Cooper, Trina	Danks, Lois	Desmond, Laird
Bryan, Karol	Carcelli, Dennie	Clarke, Mallory	Corley, Bert	Danner, Rhonda	Devereaux, M
Bryant, Anita	Cardell, Steve	Clarkson, Ann	Cornelison, Justine	Darcy, Kevin	Devlaeminck, Linda Jo
Bryant, Janice	Cardinali, David	Clay, Gretchen	Costa, Valerie	Darden, Ruth	Devlaeminck, Michelle
Buchanan, Gail	Carey, Nancy	Clay, Yolanda	Courtney, Kevin	Dare, Cheryl	Deweese, Kathryn
Buckley, Christopher	Carey, Naomi	Clayton, Ronald	Cowan, Keith	Dauel, Alta	DeWitt, Lizbeth
Buckley, Maureen	Carlin, Marianne	Cleve, Clara	Cowdrey, Paula	Daugaard, Bill	Diamond, Wendy
Buckmaster, Matt	Carlisle, Julie	Cleveland, George	Cowin, Caryn	Davidson, Bard	Dickeman, Kathleen
Budde, Sharon	Carr, Karen	Clifton, Ann	Cox, Lanie	Davidson, Jane	Dickerson, Susan
Buggy, Julia	Carroll, Audrey	Cobo, Sonia	Craig, Melissa	Davidson, Maggie	Dickey, Kim
Burac, Alex	Casper, Chris	Cochran, Hugh	Craig, Robert	Davis, Aaron	Didear, David
Burdick, Dan	Cassinelli, Pete	Cochrane, Julia	Craighead, Tom	Davis, Brent	Digiacomio, Ronald
Bures, Frank	Castelli-Hill, Susan	Coglianesse, Megan	Cranston, Christine	Davis, Gale	DiLabio, Gena
Burford, Clayton	Catlson, Jeff	Cole, Tom	Croasdale, Kathlene	Davis, Linda Jean	DiLeva, Mary Pat
Burke, Linda	Caughlan, Anne	Collecchia, Geri	Crosetto, Aaron	Davis, Melissa	Dillon, Christi
Burkhardt, Helga	Cawley, Curtis	Colley, Edward	Cross, Kelsey	Davis, Susan	Dimmitt, Rafe

Dimmitt, Ruth	Eisenfeld, Peter	Ferrari, Angela	Frye, Mahala	Gibbs, Molly	Green, Nicole
Dipasquale-Hunton, Chelsey	Eliason, Sharon	Ferrugiaro, Kenneth	Fukuda, Kristina	Gibson, Lena	Green, Stacy
Dixon, Angie	Eliot, Loreen	Fertig, Asano	Fuller, Gina	Giesy, Daniel	Green, Steve
Dixon, Joyce	Elliot, Margaret	Feyk, Craig	Fuller, Julia	Gilbertson, John	Greene, Vaughan
Doane, Anne	Elliott, Janet	Fickeisen, Kurt	Furnish, Shearle	Giles, Jim	Greenfield, Megan
Dodson, Frances	Ellsworth, Gregory	Field, Elaine	Futterman, Sanja	Gillaspy, Linda	Gregory, Barbara
Doherty, Mary	Emerson, Sandra	File, Peggy	Gallagher, Mary	Gillespie, Bob	Grenfell, Patricia
Donoso, Steve	Emmer, Matthew	Finley, Margaret	Galvin, Lisa	Gillespie, Thomas	Gross, David
Doty, Carol	Engler, Pamela	Finn, Dan	Gandolfo, Deborah	Gillespy, Nicole	Guderian, Marcia
Douglass, Andronetta	English, Jennifer	Fisher, Karen	Gannon, Vicky	Gillis, Marian	Guillory, Chris
Doulatshahi, Paulette	Enslow, Nicole	Fite, Gregory	Ganzhorn, Sarah	Gilman, Christina	Gullickson, Anna
Dove, Janq	Erckmann, Lynn	Flax, Ron	Garcia, Armando A	Gimson, Rosa	Gunter, Karlene
Dowling, Christopher	Eren, Muazzez	Flores, Isabel	Gardner, David	Girardin, Josephine	Guthrie, Barrett
Dowson, Eleanor	Erickson, Linda	Fonshill, Don	Gardner, Joy Lyn	Gitschier, Jennifer	Gylland, Kathleen
Dragavon, David	Erickson, Lynda	Ford, Ann	Gardner, Sandy	Gleason, Jeanne	Gyncild, Brie
Druffel, Pauline	Esch, Dean	Forman, Fay	Garescher, Marie	Glidden, Helen	H, M
Drummond, Paul	Espasandin, David	Forman, Janet	Garfield, Dave	Glover, Julia	H, Tess
Duffy, John	Espe, John	Fosmark, Tami	Garg, Anu	Gmeiner, Kjersten	Hackett, Jackie
Dumas, Lorraine	Estacion, Carlene	Foss, Jessine	Garner, Donald	Goddard, Jim Scott	Haile-Recio, Alvina
Dunlap, Elizabeth	Evans, Chad	Foster, Will	Garrison, Christie	Gogins, Karen	Haines, Carol
Dunn, Elmo	Evinger, Matthew	Fowler, Russell	Garrison, Kima	Gold, Robin	Hall, Anne
Dunn, John	Fahey, Anna	Fox, Erin	Gaspar, Liz	Goldberg, Daniel	Hall, Brandon
Durrum, Kathy	Fain, Glenn	Fox, Walter	Gasperoni, John	Goldberg, Laura	Hall, Jewel
Dyche, Danny	Fairchild, Jennifer	Frangos, Kate	Gaudin, Gerard F	Golding, Will	Hallman, Holly
Dyer, Doug	Farer, James	Franken, Richard	Gause, Jacqueline	Goldstein, Susan	Halloran, Michael
Dyer, Susanne Hesse	Faris, Aaron	Franzmann, Paul	Gehr, Daniel	Good, Ronda	Halpern, Lisa
Dyet, Jeffrey	Farrell, Nancy	Frazer, Megan	Gehri-Bergman, Sandra	Gorman, Patti	Ham, Michele
Dykstra, Cheryl	Farrell, Trace	Freed, Dave	Geiger, Barbara	Gorr, Michael	Hammond, Christie
Ecklund, John	Farwell, David	Freeman, Beth Jane	Geist, David	Gottfried, Susan	Hand, David
Eddy, John	Fastuca, Meagan	Freiberg, Pat	Gendvil, Derek	Govedare, David	Hanks-Bell, Marion
Edmison, Sean	Feichtinger, Dennis	French, Nina	George, Diane	Graff, Steve	Hansen, Christine
Edwards, David	Feiring, Janet	Frey, Andrew	George, John	Graff, Wanda	Hansen, Laulette
Edwards, Peggy	Felber, Michael	Frey, Katie	Gerell, Sherril	Graham, Margaret	Hansen, Nancy
Eggers, J	Feldman, Sheryl	Friedman, Andrew	Gerosa, Robert	Graham-Roseburg,	Hanson, Art
Eggers, K	Feldman, Tracy	Friedman, Marya	Gersten, Carey	Kimberly	Hanson, Mary
Ehrhardt, Carole	Fenwick, Kevi	Friedrick, Stephen	Gervais, Anthony	Grammer, Kaitlin	Hanson, Sam
Eisenfeld, Mary	Feokhari, Anton	Fries, Warren	Gessert, Kate	Grate, Joy	Harlan, Rick
	Fergot, Michael	Frye, Douglas	Gibb, Ken	Green, Jamie	Harp, Carol Lynn

Harper, Barbara	Henry, Benn	Holm, Patricia	Indrick, Doug	Johnson, Joel	Katz, Ron
Harris, Perry	Henry, Carole	Holman, Victoria	Inglish, David	Johnson, Judith	Kauffman, Katherine
Harris, Tom	Hensel, Michelle	Holme, Fran	InLove, Rich	Johnson, Lorraine D	Kaufman, Adam
Harris, Wayne	Hermann, Mai	Holt, Bill	Innes, Gwen	Johnson, Nancy	Kaufman, Diane
Harrison Buhlinger, Kieran	Hermanns, David	Holtzman, Julie	Irving, Christina	Johnson, Randall	Kaul, Cynthia
Hart, Madelyn	Hermann-Wu, Kate	Hope, Phillip	Isaac, Carol	Johnson, Richard	Kaur, Jaspreet
Hart, Sara	Hermes, Gerald	Hopkins, Steve	Isbell, C	Johnson, Yvonne	Kavaller, Kristen
Hartman, Jenny	Hernandez, Robin	Horrocks, Gina	Isischild, Ixtlan-Wales	Johnston, Emily	Kaye, Paul
Hartman, Nancy	Herr, Alec	Horton, Troy	Iverson, Steve	Johnston, Lloyd	Kaylen, Sharon
Hartung, Bridgette	Herr, Dorcas	Hostler, Ann	Jablin, Doug	Johnston, Steve	Keegan, William
Harty, Florence	Herrington, Marna	Houghton, Abigail	Jachimiak, James	Jones, Clayton	Keeney, Karen
Harvey, Jo	Heyneman, Amy	Houlette, Ryan	Jackson, Andrew	Jones, Darin	Kehrein, Micah
Hashmi, Margaret	Heywood, Susan	Howard, Carl	Jackson, C	Jones, Jeff	Keir, Emily
Hass, Susan	Hh, Nancy	Howe, Donald	Jackson, J	Jones, Kaija	Keiser, John
Haupt, Carolyn	Hickman, Elaine	Howe, Jared	Jackson, Ken	Jones, Krista	Keller, Haley
Haverfield, Heather	Hickman, Elizabeth	Howell, Betsy	Jackson, Livia	Jordan, Dorothy	Kellogg, Thomas
Hawley, Jonathon	Higgins, Kimberly	Howie, Linda	Jackson, Sasha	Jordan, Patti	Kelly, J
Hayes, Shannon	Hill, Barbara	Huddlestone, Laura	Jacky, S J	Jowdy, Joe	Kelly, Pamela
Hazen, Kathy	Hill, Michael	Hudson, Kay	Jacobbrown, Craig	Judge, Brookie	Kelso, Carolyn
Heagy, Lorraine	Hiller, Karen	Huelsberg, Carole	Jacobs, Diane	Juhl, Brandon	Kemmick, JP
Heath, Elizabeth	Hillerstrom, Sandra	Hughes, Jason	Jacobs, Eric	Kade, Rowen	Kemp, Billy
Heavyrunner, Mia	Hilo, Percy	Huigen, Diane	Jacobs, Marianne	Kaliher, Ken	Kemp, Kindy
Hedger, Lloyd	Hine, Patricia	Hull, Carrol	Jacobson, Don	Kaminski, Michael	Kemper, Michael
Hedwig Backman, Karen	Hinz, Sonja	Hull, Lisa	Jacobson, Lawrence	Kammerzell, Kay	Kenady, Marianne
Heidorn, Emily	Hipp, James	Hull, Pieter	Jamison, Vanessa	Kane, Arlene	Kerl, Julia
Heimbuch, Miranda	Hirst, David	Humes, Dennis	Jansen, Linda	Kane, Caroline	Kerr, Celia
Heinle, Janet	Hiser, Linda	Hunt, Joan	Jatul, Cynthia	Kane, Kevin	Kessinger, Jerry
Helf, Susan	Hitchcock, Keith	HuRley, David	Jensen, Jacob	Kane, Susan	Kestell, Kathy
Heller, Dennis	Hlat, Mike	Hurst, Dianne	Jensen, Katherine	Kang, Irene	Kilgore, Nancy
Heller, Margie	Hodes, Sue	Hurst, June	Jensen, Margaret	Kanit Cottrell, Chris	Kim, Ji-Young
Heltsley, Michael	Hodges, Elizabeth	Huseby, Brian	Jerome, Paul	Kantoff, Joyce	Kimball, Marsha
Heming, Kirsten	Hodson, Sally	Husted, Karen	Jessup, Holly	Kaplan, Eliot	Kimsey, Rebecca
Hemphill, Patricia Joan	Hoelke, Steve	Hutchins, Katherine	Jirkovsky Gual, Polly	Kapphahn, Gregory	Kindt, Carol
Hendrix, Allan	Hoffmann, Tom	Hutton, Joann	Joel, Taryn	Karim, Amanda	King, Carrie
Hennessy, John	Hogan, Rachael	Huxley, Frederica	Johnsen, Frank	Karlson, Fred	King, Deborah
Henninger, Francis	Hogan, Randolph	Hyldahl, Yausen	Johnson, B	Karns, Larry	King, Justine
Henrikson, S Denise	Hollinrake, Mark	Ignelzi, Noreene M	Johnson, Bob	Kasey, C	Kingfisher, Erik
Henry, Amy	Holm, Monika	Iltis, Michael	Johnson, Ellen	Kasuya, Tauny	Kinyon, Susan

Kirk, Brandon	Kumar, Keren	Leed, Mark	Loeschen, Doris	Madigan, Andrea	Mason, Brian
Kirmmse, Judith	Kunz, Jeremy	Lefevers, John	Loewen, Kandace	Madrone, Sallie Rose	Mason, Mary m
Kirschling, Karen	Kurland, Mike	Leggett, Hadley	Loftness, Kim	Maeda, Angela	Massey, Linda
Kistler, Andrew	Kurland, Miriam	LeGrande, Judith	Logan, Dale	Mafford, Spike	Mataja, Mary
Kita, Greg	Kurtz, Maya	Lehtinen, Jean Marie	Lombardo, Diane	Magie, Bambi	Mathews, Holger
Klapstein, Annette	Kus, John	Leib, Bracha	Loney, Donna	Magliola, Lawrence	Mathieu, Erin
Klassen, Sam	L, Anna	Leiva, Miranda	Long, Dave	Magner, Millie	Matthay, Anita
Klein, Phil	Ladbon, Lani	LeMaster, Susan	Loomis, Gregory	Magnotto, Luke	Matthews, Henry
Klima, Celeste	LaFleur, Teresia	Lemoine, Grady	Lorenz, Lara	Maguire, Marsha	Matzke, Tina
Kline, Daniel	LaFrance, Roberta	Lenthall, Kate	LovellFord, Margaret	Maharam, Trish	Maughan, Karen
Kline, Gerald	Lague, Rich	Lepple, Christopher	Low, Sammy	Mahlis, Larry	Maurer, Tanya
Kluge, Ilse	Lahorgue, Frank	LeRoss, Diana	Lowe, Jordan	Maki, Linda	Maxfield, Casee
Knieriemen, Susan	Lamb, Barbara	Lessard, Lynn	Lowney, Kathleen	Mallery, Fred	Maxwell, Pamela
Knoll, S	Lamonica, Julie	Leszczynski, M	Luchini, Dana	Malmquist, Virginia	May, Geraldine
Knopp, Jason	Lanctot, Kathleen	Levin, Mark	Ludwig, S	Manetti, Christina	May, Roger
Knudsen, Ben	Lanctot, Paul	Levine, Marilyn	Lukas, J	Maney, Trudy	Mayers, Marilyn
Knudson, Cynthia	Land, Martha	Levine, Rae	Lunceford, Kate	Mangan, Joe	Mazza, Valentina
Koehler, Christine	Lane, Priscilla	Levinson, Rebecca	Lundholm, Mark	Manildi, Barbara	Mazzola, Lisa
Koehler, Fran	Langland, Kenneth	Lewis, Lynn	Lutje, Debra	Manole, Bogdana	Mazzolini, Jerry
Koerwitz, Kristian	Laos, Cheryl	Lewis, Stephanie	Lybarger, Lisa	Manous, Mary	McCall, Michael
Koessel, Karl	LaPorte, Candace	Lewis, William	Lyman, Michael	Manuel, Virginia	McCarthy, Noreen
Kohlenberg, Brianna	Laris, Marcia	Libbey, Thomas	Lyman, Teresa	Manzo, Stephanie Ann	McCaul, David
Kondratieff, Joanne	Larsen, JoAnne	Lindberg, Rachel	Lymworth, Bhavana	Marckx, Scott	McCleary, Harriet
Koopman, William	Larson, Brian	Lindeke, Lianne	Lynch, Brian	Margay Burke, Bonnie	Mcclung, John
Koritz, Mark	Larson, Elaine	Lindenmeyer, Mike	Lynn MacKinnon, Bonnie	Markham, John	McCluskey, Sharon
Korn, Meryle	Lateiner, Ulyses	Linder, Dana	Lytle, Denise	Marquart, Frances	McCornack, Margeret-Ann
Kothary, Kalpita	Laurenzi, Adrian	Lindsay, Andrea	M, P	Marrs, Christopher	McCoy, Allison
Kourda, Terry	Lauzon, Charlene	Link, Patricia	M, Ulisses	Marrs, Marie	McCulloch, Mary
Kowal, Steve	Lavender, David	Link-New, Virgene	Mac Nish, Stephen	Martin, Benjamin	Mccutcheon, Meghan
Kralik, Christopher	LaVonne, Nadine	Lionz, Gloria	Macan, Edward	Martin, Jeanne	Mcdaniel, Kevin
Krell, Mieko	Laws, David	Lippman, Roger	Macdonald, Angus	Martin, Melodie	McDaniel, Skot
Kriner, Kristine	Lea, Andrea	Lipschitz, Jacqui	MacGinitie, Ruth	Martin, Rebecca	McDonald, Rachel
Kriston, Ira	Leavitt, Donna	Lish, Alan	Mackenzie, Judith	Martin, Richard	Mcdonough, Rebecca
Krueger, Jon	Leavitt, Jaci	Liss, Cynthia	MacKenzie, Sam	Martin, Sarah	McDougall, Alec
Krupicka, Kristen	Lee, Constance	Little, James	MacLeod, Dianna	Martinez, Priscilla	McDougall, Sandy
Kubik, Jerry	Lee, Kathleen	Livingston, Tawnee	Macnak, Dorothy	Martinson, Julianne J	McDowell, Monica
Kuczynski, Kathleen	Lee, Margaret	Locicero, Jessica	MacNeil, d'Anne	Maseda-Gille, Sheila	McFarlane, Brent
Kulp, Angela	Lee, Mark	Loeffler, Jonathan	Madeco-Smith, Mary	Masley, Michael	

McGill, Jen	Michaels, Peter	Moore, Linda	Nardell, Jason	O'Donnell, Maureen	Passante, John
McGovern, Donlon	Michaelson, Liza	Moran, Judy	Neal, Becky	O'Donnell, Molly	Patel, Sagar
McGovern, John	Middlebrook, Gigi	Moran, Robert	Neal, Stacy	O'Donnell, Sue	Patten, Robin
McGraw, Jane	Middleton, Herman	Morgan, Linda	Nelson, Anneliese	O'Donoghue, Tim	Patton, Carol
McGuire, Tim	Miklova, Monica	Morgan, Nancy	Nelson, John	Oggiono, Nanette	Patton, Kathleen
Mcinturff, David	Miknaitis, Gajus	Mork, Stuart	Nelson, Katherine	Ohanian, Laura M	Pauley, Jean
McIntyre, Alexader	Milhaupt, Shannon	Morphew, Karol	Nelson, Marie	O'Hara, Peter	Pavcovich, Michelle
Mckee, Dave	Mill, R	Morris, David	Nelson, Michelle	Ollendorf, Peter	Pavese, Antonella
Mckenzie, Dan	Millar, Riff	Morris, Eleanor	Nelson, Milton	Olsen, Brenda	Pearl-Thomas, Dina
McKeown Gallicho, Monica	Miller, Bonnie	Morrison, Amy	Nelson, Shirley	Olson Findley, Carey	Pearson, Rachel
McKillip, Linda	Miller, Denise	Morrissey, Matt	Nelson, Sierra	Olsson, Philip	Pedersen, Lisa
McKim, Tina	Miller, Heather	Morrone, Marina	Netusil, Paul	Ongerth, Steve	Pellerin, Christine
McKnight, Skye	Miller, Jaclyn	Morton, Twinkle	New, Bonnie	Opfermann, Bill	Penchoen, Gregory
McLaughlin, Emily	Miller, Jerry	Mosher, Melissa	Newell, Sally	Orr, Lou	Penta, Albert
McLaughlin, Julia	Miller, Joan	Moslo, Rebecca	Newman, David	Orr, Noel	Perez, Aldora
McLees, Jon	Miller, John	Moureilles, Tony	Newman, Ricki	Ostle, Marjorie	Perez, Alison
McMahon, Devin	Miller, Nancy	Mueller, Teresa	Newman, Virginia	Otterby, Lon	Perkins, ELizabeth
McManus, Jill	Miller, Robin	Muhs, Andrew	Newman-Henson, Bridgid	Otto, Kristin	Perkins, Erin
McMillan, Amanda	Miller, Sharon	Muir, Guila	Persephone	Ozment, Russell	Perkins, Sandra
McMullen, Colleen	Miller, Travis	Mulcare, James	Nichols, Barb	Ozora, Colleen	Perlaki, Jen
McPherson, William	Miller, Wister	Mulder, James	Nichols, Carmen	Packer, Robert	Perron, Patricia
Mcqueen, Teresa	Miller-Davis, Charm	Mullen, Edna	Nichols, Joe	Padelford, Grace	Persky, William
McQuitty, Mark	Millican, Diane	Muller, Catherine	Nichols, Stephen	Paine, Terrie	Peter, Joan
Mcroberts, Jim	Milliken, Gerry	Mundy, Jaye Anna	Nichols, Taylor	Paleias, Linda	Peterson, Benjamin
Meckler, Deborah	Mills, Marilyn	Munford, Debra	Nicol, Robin	Palmer, Judy	Peterson, Linda
Meek, Nick	Minich, Christopher S	Munro, Debi	Nielson, Greg	Panfilio, Carol	Peterson, Nancy
Meier, Randy	Minshew, Rev	Murawski, Heather	Nigrath, Nigeala	Pantastico, Hoa	Pettis, Carolyn
Melton, Jim	Mirz, Justice	Murphy, Dacia	Noonan, Greg	Pantely, George	Petty, Jeannine
Mendoza, Joanne	Misemer, Lisa	Murphy, Donna	Norton, Chay	Papanikolaou, Sara	Pfeifer, Nezka
Menne, Suzanne	Mitchell, Heather	Murphy, Maryann	Nosbaum, Jeffrey	Papscun, Alan	Pfister, Alice
Mercier, Lyssa	Mitchell, Jonathan	Murray, Roxann	Notaro, Ralph	Parke, Melinda	Phillips, Glenn
Mermelstein, Jon	Mitchell, Karen	Murray, Susanne	Nowicki, Maria	Parker, David	Phillips, Susannah
Merrell, Douglass	Mize, Robert	Muskovits, Steven	Nuccio, Theresa	Parker, Mark	Phinney, Barbara
Merritt, Jeanne	Mizuki, Michelle	Myers, Chris	Nulty, Tom	Parker Stellato, Robert	Phung, Tran
Metcalfe, Janel	Moeller, Robert	Myers, Mecky	Obata, Gen	Parks, Lethene	Phyliky Rimes, Carrie
Metzler, JoAnne	Montcute, Susan	N, Mary	O'Brien, Beth	Parshall, Sharon	Picchioni, George
Meyer, Carol	Moon, Sarah	Nafziger, Charles	O'Brien, Dennis	Parsley, Adina	Pickner, David
	Moore, Elizabeth	Naidnur, Joseph	O'Donald, Julie	Parson, Frances	Pietrowski-Ciullo, Evelyn

Pinto, Juliann	Rathke, Kathryn	Robertson, Gene	Russo, Jay	Schmitt, Jaylen	Shaw, Donald
Pittman, Jennifer	Rauch, Matt	Robinson, Casaundra	Rust, Aaron	Schneider, Matt	Sheats, Melanie
Plant, Chaz	Ray, George	Robinson, D	Ryan, Claire	Schoedler, Randolph	Shelby, Sharon
Ploger, Jim	Read, Barbara	Robinson, Dorene	Ryan, Maribeth	Schoettler, Joanna	Sheldon, Michelle
Podewell, Roger	Reasons, Jo	Robinson, Harold	Ryan, Patricia B	Schott, Joe	Shelley, Ian
Poggi, Pat	Reasons, Joe	Robinson, Joelle	Ryder, Sandra	Schrader, Ryan	Shepherd, Oakley-Raine
Pohl, Alex	Reding, Andrew	Robinson, Michael	Rynes, Michael	Schreier, Bryna	Sherman, Kathy
Poignant, Robert	Rees, Melissa	Rodriguez, Esther	Saarinen, Tamara	Schultz, Judy	Sherman, Mike
Poirier, Jeanne	Reese, Sarah	Rogal, Michael	Sacks, Ivy	Schureman, Lisa	Shimeall, Nancy
Polk, Nora	Rehn, Debra	Rogers, Dennis	Sadek, Deena	Schwab, Judith	Shinn, Harlan
Pollack, Calista	Reid, Brian	Rogers, Maureen	Saecker, Rosalie	Schwartz, Donald	Shively, David
Polley, JoAnn	Reilly, Linda	Rolland, Janna	Salisbury, Sandra	Schwartz, Phebe	Shoemaker, Randy
Pollock, Thomas	Reisman, Ande	Rollins, Charlene	Salter, Sarah	Schwegler, Tom	Shouse, Susan
Popoff, Dave	Remle, Matt	Rolsky, Robert	Sanchez, Sierra	Scollon, Suzanne	Shubert, Valerie
Porpiglia, Tom	Ress, Richard	Romann, Joanne	Sanders, Chris	Scott, Jennifer	Shutkin, Sara
Porter, Mark	Reynolds, Andy	Roney, Eileen	Sanders, Jeffrey	Scott, Katherine	Sibelman, Benjamin
Potts, Randall	Reynolds, Jeff	Rosales, Charis	Sandretto, Laurie	Scott, LeOla	Silva, Stephen
Poulson, Terry	Reynolds, Miriah	Rose, John	Sandvig, Daniel	Scott, Nolen	Simmler, Todd
Powell, Emily	Rhoads, Jennifer	Rose, Maggie	Sanford, Robert	Scranton, Liz	Simmons, Joe
Powell, Laurie	Rice, Kim	Rose, Rachel	Sanford, Sarah	Seals, Donny	Simonich, Claire
Power, Philip	Richardson, Margot	Rosen, Michael	Santiago, Wilfredo R	Searles, Dave	Sinclair, Margaret
Powers, Karen	Richter, Karen	Rosenqvist, Kristin	Sarna, John	Sebring, Mary	Sircar, Subrata
Prefontaine, Eileen	Rigano, Kimberly	Rossi, Linda	Sather, Alice	Segal-Mains, Caitlin	Sisson, Kathleen
Prim, Brooke	Righi, Bobby	Rossi, Patricia	Sather, Brad	Seidel, Crystal	Sjoholm, Barbara
Primrose, William	Riley, Robert	Rothenberg, Florie	Saupp, Janet	Seipel, Jill	Skantze, Vanessa
Printz, Peggy	Rincon, Anna	Rowell, Diana	Savett, Adam	Seltzer, Elizabeth	Skindziel, Dawn
Privitera, Salvatore	Ring, Susan	Rowles, Trina	Sayas, Herb	Serody, Lucille	Sklar, Gail
Proctor, Steve	Riordan, Janet	Rowson, Carolyn	Scally, Jessie	Severns, Dayle	Skolnick, Kate
Provasoli, Judith	Risser, Peter	Rowson, Robert	Scanlon, Kelley	Sevier, June	Sleight, Ryan
Provasoli, Robert	Risser, Susan	Royer, Alice	Schaefer, Kyle	Seymour, Christopher	Sloane, Sarah
Pсарas, Brenda	Ritscher, Jim	Royer, Ollie	Schaefer, Maija	Shacter, Steve	Slocum, Jean
Quenell, Leslie	Ritter, Phil	Rozner, Jay	Schanfald, Darlene	Shaffer, Matt	Smead, Sharon
Quinn, William	Rivera, Nedra	Rubenstein, Howard	Scheer, David M	Shaffer, Rachel	Smith, Baker
R, Marie	Roberg, Kathryn	Rumiantseva, Elena	Scheihagen, Eric	Shaiman, Marsha	Smith, Brenda
Rainey, Dorli	Roberson, Rick	Rummerfield, Michael	Schilling, Robert	Shan Chan, Kit	Smith, Dan
Ramee, Joyce	Robert, Gregory	Rupert, Jill	Schmidt, Kevin	Shankel, Georgia	Smith, Dennis
Ramos, Miguel	Roberts, Amy	Russ, Dale	Schmidt, Lee	Shannon, Reilley	Smith, Diane
Rappaport, Ann	Roberts, Chris	Russell, Ivan	Schmidt, Martha	Sharples, Vivian	Smith, Joan

Smith, Leslie	Stansfield, Jack	Sykes-David, Kristin	Torres, SN	Voth, Theodore	Webb, Randall
Smith, Lloyd	Stanton, Vince	Symonds, Michael	Touchstone, Lana	Votolato, Rocky	Wechsler, Susan
Smith, Meital	Stapp-Brigham, Dick	Szabo, Joseph	Tozzi, Lauren	Vrbanic, Adam	Wedekind, Lynn
Smith, Taylor	Stapp-Brigham, Sally	Tallant, Deenie	Traum, Norman	W, Byron	Weedman, Janet
Smith-Clark, Stacey	Starzman, Robin	Tanler, Ben	Trautmann, Wolf	Waering, John	Weeks, Pamela
Snider, Ronda	Stefano, Lori	Tanz Kubota, Ria	Trimble, Cailin	Wagner, Tyler	Weidman, Janet
Snow, Michael	Stein, M	Tarpley, Polly	Troup, Brenda	Wagnwe, Jane	Weiner, Judi
Sofferin, Rachel	Steiner, A L	Tate, Sharon	Truax, Brian	Wainstein, Leonard	Weinstein, Diane
Sokol, Elizabeth	Steiner, Lora	Taylor, Christine	Trudeau, Stephanie	Wait, E	Weinstein, Elyette
Sol, Araya	Steininger, Bob	Taylor, Jeremy	Trujillo, Steph	Walbridge, Sharon	Weisnewski, Joseph
Solum, Mary	Stetler, David	Taylor, Liz	Tufnell, Alexandra	Walchenbach, Peter	Welles, Shannon
Somer, Lonnie	Stevenson, Barbara	Taylor, Mason	Turner, Ian	Wald, Aloysius	Wells, Nancy
Somers, Kayleigh	Stewart, Jackie	Teed, Cornelia	Turner, Judy	Wale, Liisa	Wells, Raymond
Sonntag, Viki	Stewart, Kate	Tenerelli, Brenda	Turpin, Jo	Walker, Carrie	Wessman, Eric
Sosin, Madeleine	Stewart, Mickie	Tennant, Allie	Tuten, Maggie	Walker, Maggie	West, Alice
Sosnove, Nancy	Stickney, John	Thach, Andrea	Tylor, Ronaye	Walker-Ward, Ginelle	West, G
Southwell, Nicole	Stiffler, Tonya	Thoman, James	Ucko, Aaron	Wall, Carol	West, Lisette
Southwick, Christine	Stimson, Donald	Thomas, Antoinette	Ulmer, Gene	Wallace, Nadine	West, Paul
Spaeth, Jane	Stoeckel, Suzanne	Thomas, Jason	Unwin, Jim	Wallace, Sharon	West, Russel
Spain, Zarifah	Stolfi, Jackie	Thomas, Kat	V, Steve	Wallace, Susan	Weston, Patricia
Spalding, Cathy	Stover, Gene Michael	Thomas, Shann	Vacchiery, Kimberly	Wallrabenstein, James	Westre, Willard
Sparlin, Shauna	Strader, Brynn	Thomas, Tom	Valdez, Ella	Walseth, David	Weyer, Diane
Spear, Annie	Strassfield, Zoe	Thompson, Linda	van Alyne, Emily	Walsh, Kevin	Wheeler, Kathleen
Speer, Cheryl	Straus-Bowers, Erika	Thompson, Don	van Oers, Tricia	Walter, Amy	Wheeler, Mark
Spence, Michael	Strelke, Robert	Thompson, Eileen	Vawter, Rose	Walter, Bernard	Whitaker, Jerome
Spencer, Martha	Stroh, Ronald	Thompson, Joseph	Velkov, Elena	Walter, Jo	White, Earl
Spevak, Mark	Stunp, Willie	Thompson, Patricia	Verbeck, E	Walters, Kari	White, Nancy
Spotz, Carl	Sturdevant, Dorothy	Thomsen, Don	Vermeeren, Dirk	Walters, Matthew	Whitehurst, Carol
Sprute, Mary	Sturdy, Natalie	Thorn, Debbie	Vigars, Barbara	Walton, John	Whitesell, Edward
St John, Penny	Suarez, Mariu	Thornton, Molly	Villa, Daniel	Ward, Sheila	Whitmore, Sandra
St Martin, Darlene	Sullivan, Bryn	Thuney, Matthew	Vodonos, Irina	Warner, Teresa	Whitney, Pat
Stahl, Charlotte	Sullivan, Diane	Timm, Michele	Vogel, Steven	Warner, Valentina	Whitsell, Kirsten
Stahl, Shari	Sweeney, Wesa	Tine', Tina	Vogt, Axel	Wasserman, Linda	Whitson, Barbara
Staight, Christine	Swenson, Erik	Tobias, Alice	Vogt, Susan	Watson, Carrie	Whittle, Andrew
Stair, Ruchi	Swindell, Elak	Tobias, Justin	Voli, Carlo	Watson, Jeffrey	Wicht, Dan
Stamm, Glenn	Swinehart, Tim	Tolchin, Carole	Vorachek, Mary	Way, Janet	Wick, Sue
Stanberry, Beth	Swoffer, Thomas	Toler, Alta	Vossler, Mark	Weathers, Charis	Wickwire, Mary
Stanojevic, Erica	Sy, Steven	Torok, Joan	Vossler, Susan	Weaver, Judyth O	Widman, Jared

Wiederhold, Joe	Wilson, Michele	Wood, Antonia	Woods, Susan	Wright, Philip	Yater, Joan
Wiegman, Rosemarie	Wilson, Sharon	Wood, Deborah	Woodward, Caryn	Wright, Richard	Yogev, Yonit
Wilensky, Roy	Wilson, Tom	Wood, Elena	Woodward, Ellis	Wyatt, Aimee	Yost, Sally
Wilfing, Janice	Wilson, Winn	Wood, Gordon	Woodward, Linda	Wyatt, M Ann	Young, Rachel
Wilkins, Mary Jo	Wineman, Marian	Wood, R	Worden, Susan	Wyll, Robin	Young, Shelley
Wilkinson, Charles	Winters, Briar	Wood, Tim	Worthington, Bruce	Wyman, Jean	Youngers, Otto
Williams, Deborah	Wirth, Mark	Woodhull, J	Wright, Janet	Xavier, Marjorie	Yousoufian, Krysta
Williams, Janet	Wolfe, Chris	Woodruff, Anita	Wright, Katherine	Yang, Jing	Yust, Richard
Williams, Roger	Wolfe, Janetmarie	Woodruff, LK	Wright, Kathy	Yao, David	Zeff, Barbara
Willroth, Alana	Wolfley, Debra	Woods, Amanda	Wright, Linda	Yater, Jane	Zelman, Julia

Form Letter 11

ID	Comment Text	Response
Form 11	<p>Thank you for the opportunity to offer a comment on the Tesoro Refinery’s proposed expansion project. The DEIS does not demonstrate that Tesoro’s Anacortes Refinery is prepared to safely manufacture and export xylene, which is a highly volatile, hazardous and noxious substance. The threats that this project poses to our climate, the already crowded and narrow passages of the Salish Sea and the surrounding communities make it clear that this project should not be permitted as proposed.</p> <p>I support only the elements of Tesoro’s proposal to comply with Clean Air Act requirements and reduce the sulfur content of their fuels.</p> <p>As you continue the environmental review, please ensure that the Final EIS:</p> <ul style="list-style-type: none"> • Considers a project alternative that includes only the production of lower sulfur fuels and the clean air components of the project, but NOT the production and export of xylenes; • Accounts fully for all greenhouse gas emissions. Any mitigation or offsets should demonstrate that the reduction is real, verifiable, additional, and that it will be permanent and enforceable; • Protects worker health and safety by fully supporting and implementing all conditions and mitigations the 2010 Chemical Safety Board findings and recommendations on a point-by-point basis with independent verification; • Imposes binding mitigation to ensure that the project will not pave the way for any increase in Tesoro’s use of oil trains above current levels; • Requires a shoreline conditional use permit to limit Tesoro’s uses for crude oil loading for transport or export. • Consults with NOAA in order to fully address the proposed project’s impacts on Southern Resident Killer Whales, listed as endangered by both state and federal government, and identifies required mitigations for all project impacts; 	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylenes production and low-sulfur fuels) into different alternatives does not meet the objectives of the proposed project (see Section 1.2 for a description of the purpose and need). The SEPA Rules (WAC 197-11-402(1)) require the lead agency to analyze only reasonable alternatives when preparing an EIS. Reasonable alternatives are defined as actions that could feasibly attain or approximate a proposal’s objectives (WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p> <p>Additional information regarding the proposed project’s GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p> <p>Worker health and safety is managed in accordance with WISHA enforced by the Washington State Department of Labor and Industries, DOSH. Additional information regarding the agencies responsible for regulating worker health and safety is provided in Table 2 in Section 3.1 of this Final EIS.</p> <p>The refinery’s past safety history and measures implemented to address safety, including how Tesoro has improved safety measures since the 2010 explosion, are discussed in Appendix 2-A of the Draft EIS. Following the 2010 explosion, the independent safety board analyzed Tesoro’s safety program and recommended upgrades and additions that Tesoro has implemented. Additional information regarding Tesoro’s safety improvements since the 2010 explosion is provided in Section 3.6.3 of this Final EIS.</p> <p>The refinery has systems in place to properly handle the chemicals on site, prevent releases, control worker exposures, and respond to incidents. Further details about control measures and safety practices at the refinery are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Operational site controls – Section 2.8.5 • Existing operations and controls, process safety management, preventive measures and inspections, oil spill response, and historical environmental and safety incidents – Appendix 2-A • Potential impacts from unplanned events, including fires, explosions, and spills – Section 9.6 • Coordination and training of Tesoro and local emergency service providers – Section 11.4 <p>The proposed project would not increase the amount of crude oil delivered to the refinery. See Chapter 2 of the Draft EIS for the project description. Potential environmental impacts associated with increasing the amount of crude oil were not analyzed in this EIS and would not</p>

ID	Comment Text	Response
	<ul style="list-style-type: none"> • Requires a new NPDES permit in light of the significant increase in stormwater and new toxic chemicals; • Includes a comprehensive vessel traffic and spill assessment (of all cargoes and propulsion fuels) that analyzes all reasonably foreseeable future vessel traffic in the Salish Sea; • Includes a comprehensive xylene production risk assessment based on incident and accident data from the Tesoro Anacortes Refinery; and • Requires all project-related laden tank vessels (of any size) to be escorted by tugs of sufficient power and maneuverability to assure safe transit through the Salish Sea. <p>Thanks for your attention and concern.</p>	<p>be authorized under permits issued for the proposed project.</p> <p>One purpose of the EIS is to conduct a thorough review of the potential impacts related to the proposed project. Skagit County, as the lead agency, is overseeing the preparation of this EIS, and is ensuring that applicable regulations and requirements under SEPA are followed, including the issuance of Shoreline Substantial Development Permits. A list of anticipated permits and approvals for the proposed project is provided in Table 1-1 in Section 1.4.5 of the Draft EIS.</p> <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA's <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project's construction and operation phases (see Sections 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>Stormwater runoff during construction and operation of the proposed project would be managed to prevent impacts to waters of the state. The proposed project is designed with secondary containment to collect all stormwater runoff within the developed portions of the refinery. Accumulated stormwater would be inspected and then drained to either the stormwater sewer system or the oily water system before being treated at the refinery's wastewater treatment plant.</p> <p>Discharges to waters of the state are managed in accordance with the refinery's NPDES Industrial Wastewater Discharge Permit (Permit No. WA0000761) provided in Appendix 2-B of</p>

ID	Comment Text	Response
		<p>the Draft EIS. Stormwater that falls within the developed areas of the refinery (including newly developed areas) would be treated in the refinery’s WWTP, according to the requirements of the permit. The proposed project would create an additional 15.18 acres of impermeable surface, which is approximately equivalent to a 1.5 percent increase in the area of impervious surfaces within the refinery (see Table 5-4 in Section 5.3.2.2 of the Draft EIS). The existing NPDES permit and/or wastewater pollution prevention plan would be modified to accommodate the proposed project in accordance with state and federal requirements.</p> <p>Additional information regarding marine transportation and spill modeling, including propulsion fuel spills, is provided in Section 3.9 of this Final EIS.</p> <p>The refinery maintains its own firefighting resources, including a trained fire response team and proper response equipment, in addition to mutual aid agreements with industrial neighbors and other refineries to respond to petroleum fires or explosions. The Draft EIS discusses the availability of fire and emergency response services and potential impacts to them in the event of an unplanned event in Sections 11.4.1.2 and 11.4.2. Additional information regarding Tesoro’s emergency response planning and coordination with local services is provided in Section 3.7.1 of this Final EIS.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using licensed Puget Sound pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

A, M	Allen, Andrea	Appleton, Harold	Bahn, Theodore	Baunton, Brett	Bennett, Virginia
Abadia, Betty	Allen, Dennis	Aram, Susaan	Bahuaud, Anthony	Baxter, Joslyn	Bennion, Beth
Abbott, Billie	Allen, E August	Araya, Cindy	Bajwa, Ravinder	Baxter, Linda	Bensetler, Shirley
Abbott, G D	Allen, Susan	Archambault, Eric	Baker, Karen	Baxter, Tim	Bensinger, Irene
Abramson, Mary	Almack, Charles	Armand, Claudine	Baker, Linda	Bayley, Daniel	Bentley, Annika
Achaq, Robin	Alter, Kathy	Armand, Shirley	Baker, Vickey	Bayona, Antonio	Benusa, Ilana
Ackerman, Jan	Altman, Peter	Armillas, Mercedes	Baker, William	Beach-Moody, Barbara	Berg, Laura
Ackerman, Karmel	Amadei, Laetitia	Arnal, Diane	Baldock, Patricia	Bear, S	Berger, Christine
Ackerman, Laura	Amar, Kate	Arnold, Charles	Baldovino, Laurent	Beard, Clara	Bergeron, Sheilagh
Adams, Aaron	Amato, Julie	Aronoff, Nina	Baldwin, Blue	Beard, Valerie	Bergerud, Lisa
Adams, Erin	Amsler, Julia	Arroyo, Anthony	Ball, Betty	Beaton, Suzanne	Bergh, Darcy
Adams, James	Ancel-Wisner, Annette	Artemieff, Suzanne	Ball, Roger	Beattie, Evan	Bergstedt, Charlie
Adams, L	Anderson, Carol Lynn	Arthur, Richard	Baltin, Brian	Beattie, Jane	Bergtholdt, Edward
Adamson, Claudia	Anderson, Dave	Asher, Meredith	Baltz, Ruhee	Beatty, Janet	Berk, Heather
Adelson, Julie	Anderson, Edna	Ashley, Cathy	Banes, Debra	Beaupre, Andrew	Berkeley, Carol
Adibi, Elise	Anderson, Glen	Askins, Susanna	Barber, Carolyn	Beavers, John	Berkenhoff, Ana
Aere, Honora-Bright	Anderson, Helen	Asthagiri, Heather	Barnett, Adinah	Beckerman, Gary	Berkheimer, James
Agar, Robert	Anderson, Karen	Aston, Diana	Barney-Campbell, Noenoe	Bedford, Pauline	Berliner, Diane
Ague, Kate	Anderson, Kathleen	Astorga, Sara	Barreras, Terri	Beers, Cathy	Berman, John
Aguirre, Fran	Anderson, Marketa	Athavale, Anjali	Barrett, Donna	Begley, Katie	Berner, Kris
Agullo, Jessica	Anderson, Matthew	Atkinson, Ellen	Barrett, Lisa	Behl-Whiting, Kathy Marie	Bernstein, Joel
Ahlbach, Justin	Andersson, Joan	Audette, Jarryd	Barrows, Patrick	Behnke, Jean	Bernstein, Laura
Ahlstrand, Heidi	Anderton, Phillip	Aughey, Arlene	Bartholomew, Carolyn	Beilstein, Mike	Berwald, Jennifer
Aigner, Traudlinde	Andrews, Leslie	August, Jane	Bartlett, Elizabeth	Beitel, Timothy	Besterman, Sandra
Ainsley, Brian	Andrews, Sharon	Austin, Christine	Bartlett, Raymond	Bekemeier, Chris	Bettenhausen, Elizabeth
Akiba, Lorraine	Andrick, Jill	Avila, Dayana	Bartoli, Fabiola	Beletsky, Agnieszka	Betti, Mark
Akins, Judith	Andrieux, Elsa	Aydelott, Steve	Basabe, Beth	Belknap, Bobby	Beverly, J
Albanese, Dawn	Andrychowski, Steven	Ayres, Peter	Bassat, Candace	Belknap, Robert	Biers, Reva
Albar, Mike	Angell, J	B, Jess	Bassham, Cindy	Bell, Christi	Biggins, Jane
Albarran, Rafael	Annecone, Lisa	B, Jill	Bastian, Mark	Bell, Frances	Biggs, Amy
Albertsen, Jennifer	Anthony, Elizabeth	Babb, Steve	Bates, Gina	Bell, Rob	Biocca, Andrea
Albrecht, Lonnie	Anthony, Linea	Babcock, Reb	Battis, Chris	Bellak, Nina	Birch-Williams, Penny
Alexander, Jenifer	Anthony, Margaret	Babiak, Katherine	Bauer, Ruth	Bell-Greenstreet, Becky	Birkett, Courtney
Alexander, Zsanine	Anthony-Gardner, Ruth	Bachmor, Daniela	Bauer, Tom	Beloin, Sylvain	Bishop, Cori
Alibrandi, Jill	Anton, Sharon	Baclija, Martin	Baugh, Jon	Bender, Patricia	Bissell, Mary
Allbee, Greg	Antonio, Beverly	Bacorn, Thomas	Bauman, Cory	Benjamin, Elaine	BJ, Crystel

Black, Janet	Borso, Pam	Bridgman, Peggy	Budoff, Roslynn	C, K	Carr, Donna
Black, Rachael	Bortolussi, Susan	Brigandi, Joseph	Buescher, Barbara	C, W	Carrell, James
Black Reid, Nina	Boschert, Carol	Briggs, Geoff	Buhowsky, Joe	Cagle, Cindi	Carrillo, Daniel
Blaisdell, Jill	Bottman, Nathaniel	Briggs, Janice	Bullock, Tammy	Caldwell, Cheryl	Carroll, Kathryn
Blakely, Carmen	Bottom, Julia	Brinker, Debra	Bunis, Naomi	Caldwell, Tennie	Carroll, Kevin
Blasco, Natalie	Bourlotos, George	Brinker, Mary Jo	Burch, Lilian	Calkins, Diane	Carroll, Linda
Blastos, Nancy	Bowdish, Caroline	Broadbeck, Virginia	Burger, Nancy	Callender, Travis	Carroll, Sara
Bleifeld, Neil	Bowe, Nicola Gordon	Broadhead, Elaine	Burghart, Barbara	Calvert, Mary Ann	Carse, Marilyn
Blin, Alex	Bowman, Toni	Broecker, Ingrid	Burke, Frank	Cameron, Cami	Cartwright, M
Blincoe, Richard	Boyce, PJ	Brooker, Mark	Burke, Maureen	Cameron, Jean	Casner, George
Bloebaum, Emma	Boyne, Jonathan	Brookman, Gerald	Burks, Paul	Campbell, Benita	Caso, Mark
Bloom, Martin	Brace, Jennifer	Brophy, Tracy	Burnett, Judy	Campbell, Candace	Casper, Chris
Bloom, Naomi	Brackett, Kathy	Brouillette-Jobe, Sandra	Burns, Gail	Campbell, David	Cassens, Susie
Bloss, Jeannine	Bradford, Jen	Brown, Deb	Burns, JL	Campbell, Debbie	Cassidy, Leslie
Bloyd, Tara	Bradley, Jennifer	Brown, Doug	Burns, Susan	Campbell, Dudley	Cassinelli, Robert
Blue, Donna	Bradley, Kathy	Brown, James	Burson, Grace	Campbell, Varday	Casteel, Jessie
Bockelman, Kathy	Bradley, Mark	Brown, Leslie Danielle	Burson, Sandra	Canada, Riley	Castelli-Hill, Susan
Bogolub, Larry	Bradley, Marya	Brown, Nancy	Burt, Susan	Canalizo, Dorian	Cato, Mary
Boguske, Matthew	Bradshaw, Barbara	Brown, Paul	Burton, Christina	Candela, Macyle	Caton, Annie
Boies, Brian	Bradshaw, Lael	Brown, Ronald	Burton, Pat	Cannon, Dale	Caudill, Lindsey
Boileau, Kevin	Brady, Carol	Brown, Rose	Burval, Peter	Cannon, Tom	Cervene, Amy
Boisgard, Isabelle	Brandariz, Anita	Brown, Susann	Busching, William	Canright, Mark	Chafe, Janet
Bolach, Adie	Bray, Martha	Brown, Tina	Bush, Julie	Canright, Rebecca	Chalfa, Matt
Bolen, William	Brazen, Colleen	Browne, Mary	Bushman, Sharon	Cantu, Roel	Chamberlain, Royal
Boletchek, Stephen	Breazeale, Joseph	Bruce, Felicia	Buslot, Chantal	Cardona, Rodolfo	Chambers, Patricia
Bollert, Bruce	Breeden, Paul	Bruce, Neville	Butcher, William	Carey, Susan	Chambo, Jim
Bolling, Ronnie	Breeding, Becky	Brumwell, Keith	Butkiewicz, Mike	Cariello, W	Chan, B
Bonfield, Barbara	Bregger, Joan	Bruton, Babette	Buttery, Rickey	Carini, Marie	Chan, Sonja
Bonner, Tracey	Bremmer, Suzanne	Bryer, Diana	Butts, Cathie	Carleo, Elena	Chan, Wallace
Bonnett, Andrea	Brennan, Brien	Brzezicka, Cara	Byerley, Sylvia	Carley, Bill	Chandler, Celia
Booker, Kaseem	Brenner, Jared	Brzezinski, Matt	Byers, Bette	Carlisle, Julie	Chang, Emery
Boomhower, Debbie	Brenner, Thomas	Buch, Anthony	Byland, John	Carlson, Elan	Chang, Patricia
Boosman, Bill	Brenner-Ward, Isis	Buchanan, Heather	Byrd, John	Carlson, Kelly	Chang, Rebecca
Booth, Carolie	Breton, Denise	Buckingham, Linda	Byrne, Charles	Carmosino, Denise	Changus, Carol
Booth, Richard	Bretschger, Fred	Buckler, Deborah	C, Ben	Carpenter, Dale	Chao, Elizabeth
Bordelon, Tika	Brewer, Ginger	Buckmaster, Matt	C, D	Carpenter, Jeremy	Chapman, Antony
Bordenave, Michael	Brexel, Charles	Buckner, Ryan	C, Elena	Carpenter, Michael	Chaput, Rachel
Borske, Cindy	Bridges, Linda	Budde, Jessica	C, Haven	Carpenter, Steven	Charest, Doreen

Charlebois, Stacie	Coen, Robert	Coppotelli, Heide	Crist-Whitzel, Janet	Darlington, Beth	Deck, Avis
Charrier, Philippe	Coffey-Edelman, Lynn	Catherina	Croasdale, Kathlene	Darovic, Elizabeth	Decker, Ashley
Cherico, Ruth	Cogswell, John	Corey, Marilee	Cronin, Elizabeth	Date, Sarah	Deckert, Lisa
Cheung, May	Cohen, Judith	Cornelius, Margaret	Cronin, Gary	Daugherty, Randall	DeCristofaro, Jeffrey
Chew, Eoin	Colangelo, Annapoorne	Corona, Marianne	Cronin, James	Davenport, Robert	Dee, Diana
Childs, Courtney	Colby, Hillary	Coronado, Helen	Crosby, Christina	Davies, Karin	Deel, Ester
Chin, Cintia	Cole, Tracy	Correia, Cecilia	Crosby, Harry	Davies, Steven	DeHart, Sally
Chischilly, Jane	Coleman, Barbara	Correia, Claudia	Crosby, Harry W	Davila, Matthew	Dehtan, Joshua
Christensen, Debora	Colerich, Edward	Corry, Ronit	Crosswell, Kathryn	Davis, Brent	Delgiudice, Barbara
Christensen, Joan	Collecchia, Geri	Cosgrove, Pamela	Crowe, Clark	Davis, Dorothy Jane	Dellas, Merrill
Christian, Steven	Collier, Michael	Cossettini, Lisa	Crowe, Edie	Davis, Michelle	Deller, Jeanne
Christiansen, Susan	Collins, Gregory	Costa, Lynn	Crowley, Brooke	Davis, Randy	Delong, Pierre
Christie, Terry	Collins, Linda	Costello, Carol	Culhane, Lesley Pamela	Davis, Ryan	Delorenzo, Pete
Christoferson, Pam	Collins, Virginia	Costolo, Elaine	Cumming, William	Davis, Samuel	delPino, Rosemary
Christopher, Sandra	Collmer, Sarah	Cottrill, Scott	Cup Choy, Mel	Davis, Scheree	DeLuna, Marie Claire
Church, Jane	Colotti, Deborah	Councilman, David	Curia, Peter	Davis, Tammy	Demarais, Jackie
Church, Janelle	Colson, Ronald	Countryman-Mills, G	Curth, Mick	Davis, William	DeMarco, Joseph
Ciaffa, Marie	Colston, Laura	Coval, Deirdre	Curtis, Frank	Davison, William	Demian, [First name not provided]
Ciccarelli, Alessandro	Colton, Cammy	Cowin, Caryn	Cynamon, Michael	Dawson, Diane	Denman, Alexandra
Clark, Alice	Colton, Kathleen	Cowitz, Alyssa	D, Andie	Dawson, James	Denton, Denise
Clark, Chapman	Combs, Debi	Cox, Joseph	D, Lll	Day, Charlene	Deriggie, Ann
Clark, Maxine	Combs, Mary	Cox, Mike	Dabrowski, Mike	Day, Edward	Deruyter, Ineke
Clark, Stephanie	Comella, John	Crabill, Phillip	Dacosta, Francisco	Day, John	Desjardins, Paul
Clarke, P	Conlan, Elizabeth	Crabtree, Charles	D'Adamo, Michael	de Forest, John	Deubel, Paula Marie
Clarke, Robertta	Conner, Robert	Craciun, George	Dahill, Lisa	de Fremery, Lexie	Deubel, Paula Marie
Claytor, Patricia	Connett, Je'anne	Craft, Kayla	Dahl, Thomas	de Jesús Morales	Deutscher, Elizabeth
Cleveland, Maureen	Conrad, Norm	Craft, Sylvia	Dahlgren, Deborah	Camacho, Arturo	Devalez, Olivier
Cliff, Oliver	Conrad-Antoville, Kristin	Crago, Marcelle	Daily, G Allen	de Rivera, Elizabeth	Devlin, Adrian
Clifford, Ruth	Conrow, Harry	Craig, Ella	Dalaba, Lesli	De Sio, Elisse	Devlin, Summer
Clisson, Marjorie	Cook, Gary	Crain, Linda	Dale, Felicia	de Vlaming, Victor	Devoss, Carol
Cloud, Michael	Cook, John	Crane, Kimberly	D'Alessandro, Keith	Dea, Marilee	DeWan, Donna
Clumpner, Graham	Cooley, Marian	Cranmer, Julia	Dalinowski, M Kimberly	Deal, Brandie	Dewey, Arwen
Coates, Portland	Coontz, Sharron	Cratty, Bruce	Dander, Katherine	Dean, Rayline	Dexter, Jane
Cobb, Robert	Cooper, Ruth	Crawford, Eli	Daniels, Courtney	Dean, Shannon	Di Benedetto, Rainbow
Cobb, Sandra	Cooper, Sandra	Crawford, Holly	Danner, Rhonda	Dean, Sue E	Diamante, Nina
Cochran, Deirdre	Cooper, Yaim	Crawford, Jason	Darcy, Kevin	Deavers, Toma	Diamond, Mitchell
Cochran, Jean G	Coots, Jim	Creager, Corinne	Darden, Ruth	Debono, N	Diamond, Nichole
Coeburn, Jeanette		Cresseveur, Jessica	Darling, Carrie	DeCaria, Tina	DiCarlo, Cindy

Dickerson, Mel	Drees, Heth	Eargle, Geoffrey	Erwin, Sheila	Fexis, Deborah	Ford, Bryan
Dickerson, Susan	Dreyer, Sharyn	Earle, Susan	Escobar, Victor	Fidel, Bela	Fore, Judy
Dickey, Kim	Dubnick, Linda	Eastman, Ann	Espinoza, Debra	Fiedler, Ed	Foreman, Carol
Dickinson, Amanda	DuBois, Mitzi	Eaton, Kandace	Esposito, Eric	Field, Tanya	Forest, Paulette
Dickinson-Adams, Emily	Duckworth, Nadine	Eaton, Kathleen	Esser, Char	Fielder, Aixa	Forman, Fay
Dickson, Rebecca	Duclaud, Monica	Eckels, Andrew	Evams, Ellen	Fife, A	Forman, Janet
DiLabio, Gena	Dudley, Nancy	Ecker, Christopher	Evans, [First name not provided]	Fillmore, Jamie	Forschner, Jillian
Dill, Christopher	Dufau, Pat	Eckles, Sabrina	Evans, Elaine	Finamore, Scott	Fortgang, Mindye
Dillon, Christi	Dugaw, Anne	Edelen, Jennifer	Evask, Melissa	Findley, Helen	Fosmark, Tami
DiMaio, Lori	Dukes, Aaron	Edell, Elaine	Evenson, Dean	Fink, Brian	Foss, Leslie
DiMaio, Mercedes	Dumas, Lorraine	Edelman, Richard	Everson, Madria	Fink, Patti	Foster, Tracy
Dimmitt, Rafe	Dunbar-Miller, Grace	Edelstein, Barbara	Evon, Debra	Finlay-Kochanowski, Jeannie	Fountain, Nicole
Diner, Randy	Duncan, Bruce	Edney, Karen	Ewing, Ann	Firely, Jesse	Fowley, Doug
Dishman, Patricia	Duncan, Donna	Edrich, Daniel	Facey, Laurel	Firely, Monica	Fox, Heather
Dix, Teresa	Duncan, Pat	Edwards, Eric	Fairchild, Jennifer	Firely, Vincenzo	Fox, Larry
Dixon, Joyce	Duncan, Sylvia	Edwards, Monique	Fairfield, Richard	Firth, Arthur	Fox, Stephanie C
Dobson, Bruce	Duncan, Wendla	Eichenblatt, Glen	Fairley, Peter	Fischer, Gloria	Fox, Vicki
Dolinka, Toby	Dunham, Susan	Eide, Mary	Fairweather, Susan	Fischer, Lynn	Fraanklin, Doug
Dolins, Francine	Dunham, Suzanne	Eisenberg, Paul	Fannin, Valerie	Fischer, Marie	Fradkin, Allison
Dolins, Merelyn	Dunlap, Dorothy	Eisner, Jerry	Farber, Joan	Fischhoff, Robert	Franchini, Steve
Domke, Ellen	Dunlap, Tess	Elkins, E	Faris, Aaron	Fisher, Andrew	Franck, Faith
Donaldson, Jamie	Dunn, John	Ellers, Debra	Fass, Arline	Fisher, Jack	Franco, Diana
Donnelly, Russell	Duong, Kevin	Elliott, Marco	Feldman, Marian	Fisher, Karen	Frandsen, Karla
Donohue, David	Duran, Dani	Elliott, Tracy	Feldman, Tracy	Fisher, Myrna	Frank, Andrea
Donovan, Elaine	Duran, Eve	Elvira, Concepcion	Fellows, Paul	Fisher, Patricia	Frank, Norman
Donston, Kacey	Durnell, Tim	Elwell, David	Fenenbock, Lauren	Fisher, Sally	Frank, Yvette
Dooley, Philip	Durr, Greg	Emerson, C	Fenstermacher, Lisa	Flack, Doug	Franklyn, Rex
Dorer, Michael	Durr, Rebecca	Emilio, Barbara D	Feokhari, Anton	Flaherty, Brian	Franz, Sonja
Dorn, David	Dustrude, Tim	Emme, Linda	Ferguson, Brian	Flanagan, Judy	Fraser, Joelle
Doty, Carol	Dutschke, Stephen	Endres, Heidi	Ferguson, Charlene	Flannigan, Tim	Frazer, James
Douglass, Sharon	Dworin, Ilana	Eng, Bruce	Ferguson, Mike	Flather, Dylan	Freedman, Matt
Dowe, Chuck	Dwyer, Donald	Eng, Liza	Ferguson, Tom	Fleming, Melissa	Freels, Jeff
Downey, Deirdre	Dwyer, S	Engonidis, Peter	Fernandez, Stephanie	Fletcher, Barbara	Freeman, Beth Jane
Dowson, Eleanor	Dwyer, Virginia	Engstrom, Paul	Ferralli, Mary Lou	Flocco-McMaster, Kathy	Freeman, Dale
Doyle, Kathleen	Dyakon, Douglas	Enright, Elizabeth	Ferrari, Angela	Flood, Alison	Freson, Neil
Drake, Mercy	Dyer, Doug	Erbs, Lori	Ferrigno, Mary	Foley, Susan	Frey, Andrew
Drake, William	E, B	Erickson, Ann	Ferry, Gwen	Folger, Jessica	Frey, John
Draznin, Jody	E, Cheryl	Erwin, Cherie			Frey, Lorna

Friedman, Marya	Garrison, Kima	Gibson, Jody	Goode, Beth	Greer, Helen	Gustafson, Owen
Friedman, Terry	Garsson, Jane	Gibson, Kenneth	Goodin, Dale	Gregersen, David	Guthrie, Caitlin
FriedmanRN, Donna	Garvey, Lydia	Giesick, Christy	Gooding, Sharon	Gregg, Carolyn	Gutierrez, Emmylou
Friis, Rolf	Gaskill, Michael	Giesy, Daniel	Goodrich, D'Arcy	Gregoire, Andre	Guttenberg, Marta
Frusteri, Marianne	Gaskins, Jeff	Giesy, Theo	Goodwin, Nancy	Gregory, Maria	Guyot, Jack
Fues, Lisa	Gaskins, Melissa	Giffen, Phoenix	Goodyear, Maxine	Greiner, Tony	Gx, Perry
Fujii, Jen	Gaspar, Lawrence	Gilbert, Camille	Goppert, Donald	Grenci, Ann	Hackett, Alice
Fujita-Sacco, Noreen	Gates, Terry	Gilbert, Jennifer	Gorak, Martha	Gresko, Andrew	Haddad, Nadia
Fullerton, Richard	Gathing, Nancy	Gilbert, Joseph	Gordineer, Karine	Gresko, Michael	Hadih, Mariama
Fuqua, Chad	Gauger, Benjamin	Gilbert, Valerie	Gordon, Bernice	Grice, Gary	Hafner, Gloria
Furlong, John	Gay, Gwen	Gilbertsen, Shari	Gordon, Suzanne	Grieves, Kathy	Haggard, Alan
Furnish, Shearle	Geitner, Greg	Gilchrist, Amber	Gorgo, Jennifer	Griffey, Pat	Haggins, Helen
Furniss, Karen	Gelbart, Susannah	Giles, Jim	Gorina, Maya	Griffin-Lewin, Anne	Haines, Shauna
Furno, Sarah	Gelfand, Carol	Gill, Susan	Gorman, Thomas	Griffith, Julie	Haley, Carol
Futrell, Sherrill	Geluz, Gemma	Gillespie, Thomas	Gorsuch, Royce	Griffiths, Zara	Hall, Emily
Futrovsky, Rosemary	Genaze, Matthew	Gindele, Abigail	Gorum, Ginger	Grijalva, Tony	Hall, Michael
G, C	Gendron, Lori	Glaeske, Lynne	Goss, Alice	Griswold, Tracy	Hallberg, Joan
Gaertner, Diane	Gendvil, Derek	Glasser, Mark	Gottlieb, Jonathan	Groeger, Tim	Haller, Maryann
Gaff, Mal	Gennarelli, Jesse	Glazar, MaryAnne	Gottlieb, Olga	Gromoll, Norda	Hallford, Overton
Galasso, Joanne	George, Catherine	Glenn, Marian	Gover, Gary	Grossman, Stacy	Hallman, Janice
Galindo, Lauryn	George, Donna	Glickfield, Adam	Gover, Pat	Grounds, Sharon	Hallmark, Jena
Gallagher, Margaret	George, Sharon	Gliva, Dave	Graeber, Nichole	Grzegorzewski, Mark	Halloran, Michael
Gambarelli, Morena	Georgi, Greg	Gloor, Prisca	Graff, Wanda	Guard, Mary	Hamann, Karl
Gambol, Rhett	Gerard, Diane	Goetschius, Lascinda	Graham, Ann-Marie	Guarino, Dolores	Hamann, Susan
Gammon, Julia	Gerda, Jessica	Goewert, Marie	Graham, Barbara	Guevara, Alicia	Hamblin, Codi
Gandolfo, Laura	Gerdes-McClain, William	Goff, Frances	Graham, Danielle	Guillemard, Claude	Hamilton, Pamela
ganMoryn, Croitiene	Gergely, Katrina	Gold, Carol	Granlund, Fred	Guillory, Chris	Hamilton, Sarah
Gannaway, Gloria	Germann, Lawrence	Gold, Dan	Graver, Chuck	Guinnup, David R	Hamilton Burda, Heather
Garcia, Armando A	Gertig, Linda	Goldberg, Laura	Graves, Teresa	Gulas, Joseph	Hammond, Marcella
Garcia, Kym	Gervais, Anthony	Golding, John	Gray, Ian	Gullett, Rachel	Hammond, Tim
Garcia, Mark	Geskens, Cindy	Golding, Will	Gray, Lorraine	Gulley, Jane	Hamrick, Alice
Gardner, David	Ghelfi, Linda	Goldman, Andrew	Graziano, Alexandra	Gullo, Paula	Han, Richrd
Gardner, Kirk	Giardini, Sheri	Goldstein, Allan	Gredvig, Mikkel	Gullotta, Katharine	Handsaker, Heidi
Garfield, Dave	Gibat, Joy	Goldstein, Jody	Green, Arden	Gunn, Errol	Haney, Linda
Garmon, Toni	Gibb, Ken	Goll, Jeff	Green, Jamie	Gunter, Karlene	Hansell, Connor
Garratt, Elizabeth	Gibberman, Pamela	Gonzalez, Autumn	Green, Meredith	Gunther, Peter	Hansell, Warwick
Garrett, K	Gibbs, Sue	Gonzalez, Yazmin	Greenfield, Jane	Gurdin, Barry	Hansen, Amy
Garrido-Spencer, Sally	Giblin, Thomas	Good, Peri	Greenlee, James	Guskin, Amy	Hansen, Dameon

Hanson, Art	Hayden, Tiffany	Heuman, Christopher	Holmes, LM	Hunt, Marcia	Jenks, Robert
Hanson, Natalie	Hayduke Grenard, Mark	Hewitt, Anne-Marie	Holmes, LM	Hunt, Mary	Jennings, Scott
Haralam, Chris	Hayes, Glenna	Heyn, Joyce	Holt, Randi	Hunt, Otto	Jerz, Alan
Hardiman, G	Hayes, Jennifer	Hickey, Fran	Holte, Vera	Hunter, Stan	Jessler, Darynne
Harmer, Lisa	Hayes, Maureen	Hickman, Tammy	Holtzapple, Gregory	Hurwitz, Jeffrey	Jin, Audrey
Harmon, Susan	Hayward, Michelle	Hiestand, Nancy	Holzendorf, Victoria	Hurwitz, Susan	Johannsen, Mary
Harper, Barbara	Hearne, Leonard	Higgins, Gentry	Hommel, Teresa	Hutchins, Katherine	Johansson, Robert
Harper, Rebecca	Heath, Linda A	Hildreth, Stephanie	Homsey, Ellen	Hutchinson, Janice	Johnson, Alex
Harper, Susan	Heath, Susan	Hill, Barbara	Hoover, Janet	Ichikawa, Jeri	Johnson, Alicia
Harrington, Joyce	Heath, Valerie	Hill, Michael	Hope, Phillip	Iimura, Wallace	Johnson, Ashlee
Harrington, Tyler	Heavyrunner, Mia	Hill, Steve	Hopkins, Jean	Ingle, Evan	Johnson, Chad
Harris, Daniel L	Hedgepath, Janet	Hill, Susan	Hopkins, Tom	Iovino, Teresa	Johnson, Clay
Harris, David	Heffernan, Christine	Hillerstrom, Sandra	Horneffer, Steven	Irons, Bridget	Johnson, Gregg
Harrison, Harry	Heffron, Josh	Himes, Erica	Horton, Deanna	Irving, Christina	Johnson, Heidi
Harrison, T Hamboyan	Hegedus, Barbara	Hinkelman, Carol	House, Angela	Iseri, Martin	Johnson, Lily
Hart, Crystal	Heiks, Kristina	Hinz, Sonja	Houseman, David	Ismail, Hildy	Johnson, Lorraine D
Harter, John	Heinly, Bridgett	Hise, Jaclyn	Howard, Beatrice	Iversen, David	Johnson, Rebecca
Hartman, George	Heinrich, Hans-Peter	Hlat, Mike	Howard, Celeste	Iversen, Haifa	Johnson, Richard
Hartnett, Kathleen	Held-Warmkessel, Jeanne	Hochheiser, Harry	Howard, Karen	Jachimiak, James	Johnson, Robert
Hartofelis, Cynthia	Helmer, Kathleen	Hoenigswald, Frances	Howard, Kristen	Jackson, Bruce	Johnson, Val
Hartung, Bridgette	Helt, Ann	Hoffman, Nancy	Howard, Melodie	Jackson, Sasha	Johnson, Yvonne
Harvey, Jef	Henderson, DeWitt	Hoffman, Steven	Howe, Linda	Jacobs, Josh	Johnston, Janet
Harvey, Jo	Henderson, Kelly	Hoffmann, Deborah	Hritz, Clifford	Jacobsen, Frode	Johnston, Lloyd
Harvey, Sarah	Henderson, Michael	Hogan, Lisa	Huang, Grace	Jacobsen, Kathleen	Johnston, Philip
Hasbach, Corinna	Hendrix, Wanda	Hogarty, Ellen	Hubbard, Eric	Jahos, Ellen	Jones, Anna
Hashem, Masud	Henry, Harold	Holcomb, Barbara	Huber, Michael	Jamal, Kate	Jones, Clayton
Hashemi-Briskin, Jordan	Hepfer, Anne	Holcomb, Lorraine	Hudson, Kathryn	James, Gordon	Jones, Coralie
Haskins, Eric	Herbert, Emily	Holder, Mary	Hughes, Angela	Jannicelli, Barbara	Jones, Jan
Haslag, Robert	Herbert, Jack	Holder, Phillip	Hughes, Barbara	Janusonis, Gintas	Jones, Jeffrey
Haslöwer, Miriam	Herger, Loretta	Holland, Gabriele	Hughes, Curtis	Janzuk, Stan	Jones, Karen
Hass, Susan	Hermann, Ivette	Holler, Stephen	Hughes, Kevin	Jarvis, G Joan	Jones, Kyle
Hatfield, Carol	Hernandez, Thomas	Hollie, Paula	Hughes, Sue	Jastromb, Virginia	Jones-Bedel, Laura
Hatfield, Melissa	Herold, Ana	Hollis, Kimberly	Huigen, Diane	Javinsky, Elizabeth	Jordan, James
Hathaway, Susan	Herrero, Pablo	Hollister, David	Hull, Gary	Jean, Laquisha	Jorgensen, Lesley
Hauck, Molly	Herzog, Robert	Hollon, Hollie	Hull, Juanita	Jefferson, Meg	Joseph, Elizabeth
Hauer, Nancy	Herzstein, Sandra	Holloway, Hakeem	Hulsewede, Deborah	Jeffery, Brian	Josephson, Stephen
Haverkamp, Kathy	Heslin, Rilla	Holman, Victoria	Humphreys, Marla	Jenkins, J	Joy, Graham
Hawley, Erica	Hesselmann, Patrick	Holmes, Howard H	Hunt, Bruce	Jenkins, Kimberly	Junek, Mary

Jung, Diana	Kelly, Alice	Kirchner, John	Koritz, Mark	Lamb, Barbara	Lehtinen, Jean Marie
Jung, Scott	Kelly, Angela	Kirkwood, Earla	Kory, Robin	Lambert, Angela	Leigh, Tracy
Jurgensen, Catherine	Kelly, Barbara	Kirschling, Karen	Kosowicz, Aleks	Lambert, Susan	Leinbaugh, Tracy
K, C	Kelly, Elizabeth	Kissling, Elmone	Kossow, Michael	Land, Martha	Leipzig, Laura
K, J	Kelly, Sandra	Kite, Richard	Kotulic, Joe	Landowski, Jodi	Leiva, Mariella
K, Melissa	Kelso, Kerry C	Kittner, Lorraine	Kouzel, Lynn	Landuyt, Renee	Leiva, Miranda
K, R	Kemp, Kindy	Kittrell, Mike	Kraft, Manuela	Lane, Sandra	Lemkuil, Rita
Kaeufer, Edward	Kemper, Michael	Kjono, Pamela	Kram, Ruth	Lang, Elliot	Lemoine, Kathryn
Kafka, Mo	Kenady, Marianne	Klasnikov, Lydia	Kranowski, Steven	Lang, Liana	Lemos, Larry
Kafton, Pamela	Kendall, Trista	Klass, Naomi	Krapf, Debbie	Langelan, M	Lenchner, Nicholas
Kahigian, Peter	Kennedy, Barbara	Klein, James	Krause, Doug	Lara, Dan	Lenhart, Donna
Kane, Brooke	Kennedy, Karen	Klein, Linda	Krause, Karen	Laramie, David G	Lennick, BrendaLee
Kang, Irene	Kennedy, Kyle	Klepek, Lisa	Krell, Mieko	Larimer, Ann	Lenthall, Kate
Kantmann, Hillary	Kennedy, Robert	Kliche, Diana	Krempa, Nancy	Larson, Dick	Leon, Mary
Kaplan, Robert B	Kensler-Prager, Kim	Kline, Gerald	Krewson, Caroline	Larue, Erik	Leonard, Beverly
Kapusinski, Zoey	Kent, Barbara	Klod, Sharon	Krichevsky, Evan	LaSchiava, Dona	LePow, Cody
Karlson, Fred	Keough, Paul	Klosterman, Pete	Kritzman, Philip	Lastra, Ann	Leske, Jim
Kastel, Diane	Kerchevall, Charlene	Knapp, Harry	Kronheim, David	Lato, Bernadette	Lessard, Debra
Kasten, Christine	Kershner, Harry	Knight, Susan	Krucoff, Rachel	Laughlin, Dawn	Leszczynski, M
Katten, DC	Kessinger, Jerry	Knipp, Donna	Krueger, Jon	Lautenberg, Maxine	Levesque, George
Katz, Sara	Kessler, Robert	Knoble, James	Kruger, Henry	Lavacca, Ken	Levin, Beth
Kaulbach, Elizabeth	Ketron, Laurie	Knoll, Carolyn	Krupinski, Keith	Lavallee, Izzi	Levin, Cathy Elizabeth
Kawakami, Tedd	Kevany, Kathryn	Knott, Ann	Kuhn, Barbara	Lawrence, Rhett	Levine, Rhoda
Kay, Roxann	Kevany, Michael	Knox, Elena	Kuhn, Peter	Lawson, Joseph	Levine, Sandy
Kay, Sasha	Key, Louise M	Knox, Oliver	Kukkonen, Holly	Lawson, William	Levinson, Elana
Kazak, Ilene	Khambholja, Ann	Knudson, Linda	Kulp, Jeff	Lean, DA	Levinson, Rebecca
Keating, Jane	Kilgore, Nancy	Koch, Joann	Kumar, Keren	Leary, Joanna	Lewis, Erma
Keating, Lucy	Kilimnik, Karel	Kocoras, Peggy	Kuntz, Jean	Leatherwood, Fran	Lewis, Kathleen
Keeland, Bobby	Kimble, Paige	Koehler, Christine	Kunze, Jennifer	Leavell, Janet	Lewis, O
Keeler, Lexi	Kindel, Karen	Koeninger, Laura	Kuter, Ann	Lebert, Mary	Lewis, Patrick
Keeler, Mary	King, David	Koerwitz, Kristian	Kwiecinski, Robert	Lecorps, Martine	Libby, Dominic
Keeling, Raymond	King, Judith	Koessel, Karl	L, A	Lee, Virginia	Libby, Erin
Keim, Lisa	King, Justine	Kohnert, Christine	L, Andy	Lee Miller, Claudia	Lichtenbert, Bob
Keiser, John	King, LB	Koiv, Ulle	L, Jamie	Leeman, Cavin	Lienhard, Judith
Keiser, Robert	King, Sara	Kommerstad-Reiche, Carol	L, Jamie	Leestma, Charlene	Light, David
Keith, Lindsay	King, Serina	Kondratieff, Joanne	L, Th	Lehecka, Bonnie	Light, John
Kellermann, Thomasin	King, Theodore	Koppel, Sandra	Laabs, Sharon	Lehecka, William	Lightfoot, Nancy
Kelley, Sheila	Kirchhoff, Joana	Korioth, Lori	LaClaire, Joy	Lehmann, Eric	Likins, Jessica
			Lake, Jennifer		

Lilly, Carolyn	Lopez, Jonathan	MacLamroc, Alan	Marks, JB	Matz, Tamara	McGlenister, Tom
Lilly, Marilyn	Lorenz, Lara	Maclise, Lauren	Marley, Joy	Maxfield, Casee	McGrath, Joanne
Lin, Ching-Yi	Lou, Ray	MacNeil, d'Anne	Marone, Susan	May, Dana	McGraw, Jane
Linda, Lauren	Lovelace, Lanelle	Macy, Michelle	Marsh, Judy	May, M	McGrogan, Kathleen
Linden, Susan	Loveland, Jim	Madden, Molly	Marshall, Rebecca	Mayerat, Robin	McGunagle, William
Linder, Dana	Lovell, Sydney	Madden, Susan	Martin, Abe	Mayers, Katherine	Mchugh, Patricia
Linder, Patty	Low, Sammy	Madison, Pam	Martin, B	Maynard, William	McInnis, Anita
Lindey, Robert	Lowe, James	Madsen, Margaret	Martin, Benjamin	Mazzola, Lisa	McIntire Edwards, Caryl
Lindquist, Linda	Lowe, Kay	maez Garcia, Abi	Martin, Drew	McAfee, Alan	McIntyre, Rene
Linerud, Tim	Lowe, Kimberly	Maggied, Michael	Martin, Ed	McAuliffe, Mary	McKee, John
Link, David	Lowe, Monitta	Maghakian, Mike	Martin, Fred	Mcbride, Robert	McKeever, David
Link, Susan	Lowery, Candice	Magliola, Lawrence	Martin, G	McCall, Kerrin	McKelvey, Don
Link-New, Virgene	Lozano, Luis	Magne, Kathy	Martin, Ken	McCall, Ruth	McKelvey, Gerald
Linton, Beverly	Lucas, Shirley	Maguire, Terrill	Martin, Michael	McCarthy, Susan	McKenna, Jacci
Lionetti, Marc	Ludolphi, Nicolette	Mahder, Debbie	Martin, Patti	McCaslin, Glenn	McKillip, Linda
Lipman, Deborah	Lukas, J	Maiden Mueller, Paul	Martin, Ruth	McCleary, Harriet	McKim, Tina
Lips, Bev	Lum, Danny	Mainiero, Joanne	Martinez, John	Mcclintock, B A	McKinlay, Bonnie
Lipschitz, Jacqui	Lund, Cindi	Majerowicz, Eugene	Martinez, Priscilla	McCluskey, Chris	McKnight, Ellen
Lipsey, Michaela	Lund, Sonja	Malcher, Denise	Martinson, Julianne J	McComb, Sandy	McLane, Kathleen
Lipsey, Steve	Lundie, James	Maldonado, Gloria	Maruki-Fox, Setsuko	McConchie, Alan	McLane, Richard
Liske, Patricia	Luxem, David	Malick, Vicki	Masley, Michael	McConnell, Kelly	McLaughlin, Laurie
Litwin, Julie	Lyman, Teresa	Mallaber, Ray	Mason, Elliot	McConville, Cristen	McLaughlin, Timothy
Liu, Sue	Lynch, Michal	Malmuth, Sonja	Mason, John	McCool, Mike	Mclean, Alex
Livingston, Elaine	Lynch, Nancy	Malven, Tania	Mason, Mary m	McCoy, Joan Ellen	McLeod, Phoebe
Lochner, Steve	Lynn, Sandra	Malyon, Ann	Mass, Ursula	McCullough, Debra	McMullen, Colleen
Locke, David	Lytle, Denise	Manchester, Nora	Massa, Joy	McCullough, Elizabeth	Mcnamara, Karla
Loftis, Paula	M, Amy	Manchester, Robert	Massaro, Sherry	McCullough, Maureen	Mcnamara, Mair
LoGiudice, Christopher	M, Frances	Manetti, Christina	Massey, Eileen	McDaniel, Carol	McPherson, Sandra
Lohr, Margaret	M, Shira	Manges, Laura	Massey, Linda	McDaniel, Christine	McRae, Frank
Lommel, Lois	Mabry, Monica	Mantapert, Anthony	Massman, John	McDaniel, Larry	Mcshane, Janice
Long, Dave	Mac Phail, Heather	Marasco, Summer	Mastri, Francis	McDaniel, Skot	Meade, David
Long, Laura	Mac_Nish, Robert	Marcus, Marilyn	Mata, Mercedes	McDermitt, Evan	Meade, Pattie
Long, Marilyn	Macdonald, Angus	Margay Burke, Bonnie	Mateas, Lisa	Mcdonald, Kimberly	Meagher, Michael
Longsworth, Jon	MacDougall, Scott	Margolis, David	Materi, Sandra	Mcdonough, Rebecca	Meaux, Andre
Longyear, Sharon	Mack, Jean	Margolis, Laurence	Matilsky, Barbara	McDuffie, Holly	Medlin, Barry
Lopes, Maria	MacKenzie, Michelle	Margolis, Martin	Matsumoto, Mari	McEachronTaylor, Linda	Melcher, John
Lopez, Christian	Mackey, Sally	Mariani, Eugene	Mattiace, Ezio	McFarland, Teresa	Melin, Ron
Lopez, Covi	Mackie, Judie	Marino, Nate	Mattson, Sandra	McGarvey, Will	Melnick, Ruth

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Melton, Jim	Minault, Kent	Morgan, Tess	Myers, Jeffrey	Nieland, Carolyn	Odell, Rollin
Meltzer, Rachel	Mistretta, Jill	Morgen, Henry	Myers, Wendi	Nieland, Tom	Odonnell, Laura
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Merino, Aimee	Mitchell, Kristy	Moritz, Hein	Nadel, Barbara S	Nieman, Kimberly	Oerke, Carl
Merino, Margaret	Mitchell, Michael	Morris, Lori	Nadler, Jeff	Nimmons, Rebecca	Oestreicher, Robert
Meriwether, Don B	Mitchell, Michelle	Morris, Steven	Nafziger, Nikki	Nitz, Jennifer	Offill, Jo
Merlesena, Michael	Mittan, Ron	Morris, Vonya	Nagle, Michelle	Noblett, Dianne	O'Flaherty, Meghan
Merrill, P	Mize, Robert	Mory, Stephanie	Nagy, Barbara	Nock, Andrea	Oggiono, Nanette
Messatzzia, Linda	Mo, T	Moshier, Lynn	Naidnur, Joseph	Noel, Letitia	Ogilvy, Avis
Messick, Scott	Moats, Michael	Mosier, Akila	Naiman, Shoshanah	Noordyk, James	Ohanian, Laura M
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Meyer, Harold	Moix, Jennifer	Moulder, Linda	Napoli, William	North, Maureen	Oholorogg, Dana
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Michel, Morgan	Molina, Norma	Mouzourakis, Katherine	Nash, Kenneth	Notaro, Ralph	Olsen, Corey
Middleton, Deborah	Molineaux, Pascal	Mouzourakis, Nick	Nasif, Roman	Notary, Kimberly	Olsen, Corey E
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Pearson, Juliet	Phillips, Suzannw	Price, Charlotte	Rehn, Debra	Rincon, Anna	Romine, Janet

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Rose, Pat	Saalwaechter, Susie	Schlaffer, Runa	Scribner, Denee	Shaw, Madeline	Simon, Jill
Rose, Rachel	Sabinson, Mara	Schlatter, Jeanne	Scripp, Margaret	Sheehan, IL	Simonian, Thomas
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Rosenberg, H	Sagovac, Emily	Schlemel, Pierre	Seaborg, Dave	Sheggeby, Stan	Sines, Charlotte
Rosenkotter, Barbara	Saint, Paul	Schlinger, Debbie	Sears, Julie	Shelby, BC	Singleton, Christina
Rosin, Steve	Saitta, Martin	Schluter, Mary	Sebastian, Roberta	Shelley, Ian	Singleton, Jon
Ross, Lilli	Salauyeva, Irina	Schmidt, Jennifer	Sebesta, Duane	Shen, Gloria	Singleton, Niki
Roth, Arlene	Salaz, Antonia	Schmidt, Kevin	Sedakow, Tami	Shepherd, James	Singmaster, Heather
Roth, Sheliah	Salazar, Joe	Schmidt, Laurie	Seeherman, Ellen	Sherman, Joyce	Sircar, Subrata
Rothstein, Richard	Salcedo, Corinne	Schmidt, Susan	Segal, Bobbi	Sherman, Marcia	Sitkin, Bill
Rothwarf, Jeanne	Salisbury, Dawn	Schmitt, Greg	Seim, Donald	Sherman, Nicholas	Sitnick, Joan
Rourke, Patrick	Salt, Max	Schneid, Lucy	Seliga, Joseph	Sherriff, Shel	Sixtus, Michael
Rouse, Ronnie	Samp, Cecelia	Schneider, George	Sellon, Louise	Sherwood, Kate	Skalecki, Joseph
Rowe, Kenneth	Sampson-Kruse, Cathy	Schnitman, Tamra	Sells, Greg	Shield, Kat	Škali?, Dita
Rowell, Patricia	Samuelson, Robert	Schoo, Steve	Selquist, Donna	Shields, David	Skelton, Laura
Rowlas, Andrew	Sanderson, Cynthia	Schoukens, Saskia	Seltzer, Elizabeth	Shilling, Bruce	Sketo, Steve
Rubel, Scott	Sanford, Ken	Schreiber, John	Seltzer, Kathleen	Shimeall, Nancy	Skillett, Ardis
Ruby, Kenneth	Sanner, Alyss	Schreier, Bryna	Seltzer, Meg	Shiner, Dianne	Skinner, Michelle
Ruby, Meg	Santa, Linda	Schriner, Macie	Sennett, Frank	Ship, L	Skolnick, Kate
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Rudnicki, Miranda	Saportas, Joseph	Schroeder, Jeff	Serra, Ragen	Shoemaker, Lynn	Slaten, Constance
Ruiz, Antonio	Sargent, Shawn	Schroeder, Wendy	Serratore, Danielle	Shoham, Amit	Slater, Nick
Ruiz, Lauren	Sarmiento, Antonio	Schuchard, Susan	Setaro, Sally	Shook, Philip	Slaven, Joseph
Ruiz, Tino	Sarovec, William	Schultz, Toby	Seveland, Madeline	Short, Carol	Slawinski, Katherine
Rule, Juliann	Sather, Alice	Schultz, William	Severson, Carol	Short, Marjorie	Slifka, Matt
Rulli, Nicholas	Saunders, Laura	Schumacher, Alexandra	Sewald, Michelle	Shuben, Jeffrey	Slikas, Elizabeth
Russell, Ivan	Saunders, Richard	Schumacher, Brandy	Shaak, Susan	Shurtleff, Tina	Slote, Karen
Ruth, Joy	Savage, Edward	Schwartz, Elizabeth	Shadwick, Angela	Shuster, Marguerite	Small, Sally
Rutherford, Jay	Sawyer, Marvin	Schwartz, Marge	Shafer, Kimberly	Sibley, Carol	Smarr, Janet
Ryals, Sara	Saxty, Jillian	Schwartz, Ronlyn A	Shaffer, Nicole	Siddique, Omar	Smith, Adrian
Ryan, Therese	Scanlon, Kelley	Schwarz, Diane	Shalat, Harriet	Siebenaler, Elaine	Smith, Aimee
Ryba, Beau	Scena, Marian	Schwarz, Robin	Shankel, Georgia	Sieck, Joanne	Smith, Carolyn
Rybicki, John	Schahinger, Dianne	Scibetta, Jen	Shapiro, Ellene	Sifuentes, D	Smith, David A
Rykowski, Katherine	Scharf, David	Scileppi, Jade	Shapiro, Leslie	Silkiss, Vicki	Smith, Dea

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Smith, Judith	Spoon, Leslie	Stewart, John	Svoboda, William	Thelander, Donna	Treppeda, Cassandra
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Smith, Kim	Spyker-Duncan, Kasi	Stewart, Sharron	Swanson, Kristen	Thomas, Jamie	Triff, Asdur
Smith, Lilinoe	Squire, Julie	Stidham, Mark	Swanson, Roberta	Thompson, Lauren	Tripp, Tom
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Smithwick, Eleanor	Stanojevic, Erica	Stolfi, Jackie	Taber, Wayne	Tigerlily, Eliot	Tuch, Christopher
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So, Marian	Steele, Dale	Struhsaker, Thomas	Taylor, Aileen	Tobin, Leo	Turner, Jess
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Wade, Julie	Watson, Danny	Wenzel, Joseph	Willis, Sue	Worrell, Glen	Zwerman Redler, Gail
Wade, Kimberly	Watson, Harold	Werner, Katherine	Willroth, Alana	Woudstra, Gerrit	Zyzanski, Greg
	Watson, Laurel	West, Diane	Willsey, James	Wozniak, Steve	

Form Letter 12

ID	Comment Text	Response
Form 12	<p>I appreciate the comprehensive analysis the county’s draft Environmental Impact Statement has done of Tesoro’s proposed Clean Products Upgrade Project, and would like to express my continued support for the project and Tesoro.</p> <p>Tesoro has been a dedicated member of our community for nearly two decades, and I know their commitment is appreciated by myself and my neighbors. This project is a clear sign of Tesoro’s intention to play an important role in not just our community’s present, but also our future. By creating new jobs, bringing more tax revenue into the county, upgrading the refinery’s equipment and lowering the refinery’s environmental footprint, it is clear they want to our community to retain its strong economy and clean environment.</p> <p>It is exciting to see a business invest so much in its surrounding community. I support Tesoro’s proposed project and urge the county to approve the project.</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

Anderson, David
 Brown Jr, Jesse
 Glasgow, Zachary A
 Helwick, Amanda
 Jenson, Thomas
 King, Rita
 Kinser, Jordan
 Le, Thang
 Lione, Mark
 Martin, James
 Patel, Sach

Powell, Leslie
 Rongs, Daniel
 Rustad, Bruce
 Stalcup, Scott
 Sullivan, Jamie
 Thompson, Kris
 Thompson, Tye
 Tiberghien, Lyle
 Veroort, Gerald
 Walker, James
 Zimmerman, Phillip

Form Letter 13

ID	Comment Text	Response
Form 13	<p>I am writing to express my support for Tesoro’s Clean Products Upgrade Project.</p> <p>As a member of our community, the Salish Sea and surrounding environment has always been an important part of my life. That is why I am happy to see Tesoro’s commitment to the local environment through their investment in a project that will reduce greenhouse gas emissions by over 300,000 metric tons per year and lower wharf emissions by 95 percent.</p> <p>Tesoro has taken several steps to protect the waterways in our community and made sure that marine traffic will only increase minimally- no more than up to five marine vessels per month and will not exceed historical averages, according to the Draft EIS. The fact that Tesoro is investing in this project and this community demonstrates their concern and respect for the community and environment where they do business.</p> <p>I believe the draft EIS is comprehensive and considers all of the issues relevant to our community. I am proud to support this project and I believe it will bring many benefits to our community.</p> <p>Thank you for your consideration</p>	Thank you for your comment.

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

Blackburn, Natalie
 Bowlin, Ronald B
 Brehmer, Bob
 Brehmer, Lois
 Childs, Victor
 Franutovic, Jerry J
 Garner, John
 Kim, Boo-Ja
 LaFleur, Mary
 Martin, Roberta J
 Morrison, Larry

Olsen, Francis K
 Olson, Brian
 Rilea, Leland R
 Shaffer, Robert E
 Shaw, Kaye D
 Shelton, Jack E
 Walker, James
 Walker, Meredith
 Yates, Donald
 Yates, Janice

Form Letter 14

ID	Comment Text	Response
Form 14	<p>[introduction varies]</p> <ul style="list-style-type: none"> Tesoro’s 2010 fatal refinery explosion and the refinery’s recent violation of the Clean Air Act raise questions about whether this refinery is prepared to safely manufacture and export xylene. More tank vessel traffic will increase the risk of xylene, reformat and engine fuel spills. The increase in vessel traffic also increases noise impacts to our endangered orca whales. A xylene spill will cause severe air quality impacts to our residents, visitors, boaters, first responders, and marine ecosystem. Any accident or spill from project vessels can cause delays to essential ferry traffic. Any spill from project vessels can cause impacts to boaters, fishers, and whale watchers. A project vessel spill will result in significant and long-lasting impacts to our islands’ natural beauty and tourism economy. The DEIS spill modeling did not include all the project cargos or any propulsion fuels or complications from adverse weather conditions — as required by state law. <p>Any “Final Environmental Impact Statement” must include the following:</p> <ul style="list-style-type: none"> A project alternative that includes ONLY the production of low-sulphur fuels. A full account of all greenhouse gas emissions from the project. Use Spill modeling methods and scenarios that have been developed in consultation with diverse stakeholders, including marine science institutions, environmental organizations, and local governments. Consultation with NOAA to fully address the project’s impacts to the state and federally listed as endangered Southern Resident Killer Whales, including impacts from project vessel 	<p>The objectives of the proposed project are provided in Section 1.2 of the Draft EIS. Separating the two major components (xylene production and reduced sulfur fuels) into different alternatives does not meet the objectives of the proposed project to improve the refinery’s capability to deliver cleaner transportation fuels per USEPA requirements and to enable the refinery to produce mixed xylene feedstocks, diversifying the refinery’s product mix. The SEPA Rules require the lead agency to analyze the proposed action, the no action alternative, and reasonable alternatives when preparing an EIS. Reasonable alternatives are defined under SEPA as those that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b) and WAC 197-11-786). Alternatives considered by the proponent are described in Section 2.9 of the Draft EIS.</p> <p>Additional information regarding the proposed project’s GHG emissions and potential mitigation is provided in Section 3.3 of this Final EIS.</p> <p>The spill modeling included spill scenario volumes at the refinery dock consistent with the Northwest Area Contingency Geographic Response Plans and the Tesoro Oil Spill Contingency Plan, which is approved by the Washington State Department of Ecology and the U.S. Coast Guard. Spill scenario volumes in the Salish Sea were selected to be consistent with the federal spill planning volumes of 33 CFR 155.1020 and include the worst-case discharge, which means a discharge of a vessel’s entire cargo. Average summer and winter meteorological data (wind speed and direction) were used for each spill scenario location. ADIOS 2.0, a weathering model, and GNOME, a trajectory model, both provided by NOAA, were used to assess fate and behavior under a variety of spill scenarios (see Appendix 13-A of the Draft EIS, prepared by Polaris Applied Sciences in 2016).</p> <p>The USFWS and NOAA NMFS were notified of the availability of the Draft EIS and public comment period. The ESA and MMPA require consultation with the USFWS and/or the NMFS if a federal agency undertakes, funds, permits, or authorizes any action that may affect endangered or threatened species, or designated critical habitat, or marine mammals, such as the endangered Southern Resident killer whale. The proposed project may require a permit under Section 10 of the RHA from the USACE. As part of this permit process, the USACE may consult with the USFWS and/or NMFS regarding threatened, endangered, or candidate species for listing under the federal ESA and/or their designated critical habitat and for marine mammals protected under the MMPA.</p> <p>In addition, NOAA’s <i>Recovery Plan for Southern Resident Killer Whales (Orcinus orca)</i> published by the NMFS in 2008 was the primary source for the baseline information used in</p>

ID	Comment Text	Response
	<p>noise and spills of all cargos and propulsion fuels. If the project's impacts to the Southern Resident Killer Whales can't be mitigated, the project proposal should be denied.</p> <ul style="list-style-type: none"> • A comprehensive vessel traffic and spill assessment that analyzes all project cargos and engine fuels and all reasonably foreseeable future vessel traffic in the Salish Sea, including Canadian vessel traffic and the increase in the size of container ships calling at ports in the US and Canada. • Mitigation of all impacts to Washington State Ferries, including the risk of disruption in service if there is a spill of any cargos and/or propulsion fuels. • A requirement that all project-related laden tank vessels of any size be escorted by tugs that will assure safe transit through the Salish Sea east of Port Angeles. • Economic and environmental impacts to the San Juan Island National Historical Park and the San Juan National Monument from all project-related vessel cargo and fuel spills. • Potential damage to our region's "beautiful marine environment" brand from all project-related fuel and cargo spills, including the impacts to tourism, vacation and retirement home revenues, and fisheries — impacts that will persist longer than the duration of any spill. 	<p>the Draft EIS to analyze potential impacts on Southern Resident killer whales. Technical Guidance published by the NMFS was used in the Draft EIS for assessing the effects of anthropogenic sound on marine mammal hearing (NOAA Technical Memorandum NMFS-OPR-055, July 2016). The Draft EIS analyzes potential noise impacts on Southern Resident killer whales related to increased vessel traffic during the proposed project's construction and operation phases (see Sections 7.4.1.5 and 7.4.2.6, respectively) and analyzes cumulative impacts of increased noise in Section 7.7 of the Draft EIS. Potential impacts on the Southern Resident killer whale population in the event of a spill are analyzed in Section 7.4.3 of the Draft EIS.</p> <p>Measures that would be taken to protect marine wildlife are discussed in the following sections of the Draft EIS:</p> <ul style="list-style-type: none"> • Compliance with the Endangered Species Act and the Marine Mammal Protection Act – Section 7.3.3.10 • Vessel safety and waterway management, including environmental safety, collision avoidance, and requirement for having a Puget Sound licensed pilot aboard, among other measures – Section 13.4.1.2 • Spill response in the event of a release of mixed xylene or reformate into the marine environment – Section 13.5.7 <p>Additional information regarding agencies responsible for regulating marine vessel traffic and for protecting Southern Resident killer whales under the Endangered Species Act is provided in Table 2 in Section 3.1 of this Final EIS. Additional information regarding potential impacts of the proposed project on Southern Resident killer whales is provided in Section 3.5.1 of this Final EIS.</p> <p>Additional information regarding marine transportation, spill modeling of vessel fuels, spill likelihood, and spill response is provided in Section 3.9 of this Final EIS. Proposed mitigation measures are provided in Chapter 4 of this Final EIS.</p> <p>The Draft EIS discusses the increase in vessels as a result of the proposed project in Section 13.3 and the cumulative impacts on vessel traffic and vessel safety from past, present, and reasonably foreseeable future actions in Section 13.6. Reasonably foreseeable future projects and actions that, in combination with the proposed project and past actions, could potentially result in cumulative impacts are listed in Table 1-2 in Section 1.7.2.2 of the Draft EIS. The Draft EIS discusses cumulative impacts from increased vessel traffic in the following sections:</p> <ul style="list-style-type: none"> • Air quality and climate change – Sections 4.7 and 4.8 • Marine birds – Section 6.6

ID	Comment Text	Response
		<ul style="list-style-type: none"> • Southern Resident killer whales and other marine resources – Section 7.7 • Human health – Section 9.7 • Land and shoreline use, recreation, and visual resources – Section 10.6 • Cultural resources – Section 12.7 • Vessel traffic, vessel safety, and spill risk – Section 13.6 <p>If a spill were to occur along the marine vessel transportation route, the potential impacts to vessel traffic, including ferry service, are discussed in Section 13.3 of the Draft EIS.</p> <p>During transits of the Salish Sea, tankships (including tankers and tug barges combinations such as ATBs) are required to be operated by a licensed pilot with knowledge of the waters to be navigated in accordance with U.S. Coast Guard regulations (46 CFR 15.812) and the Washington State Pilotage Act (RCW 88-16-180).</p> <p>In addition, all project-related tankers transporting petroleum-based materials including xylene and reformate would require tug escorts in accordance with the Pilotage Act (RCW 88-16-190). Inbound escorts would start at Buoy Romeo (positioned halfway between Port Angeles and Rosario Strait) and would continue to the refinery. Outbound escorts would start at the refinery and conclude at Buoy Romeo. Tug escort is not required if the tankers are empty. Tug barge combinations such as ATBs are below the weight threshold and do not require tug escort.</p> <p>Tesoro would also require that contracted marine vessel operators, including those responsible for transporting xylene and reformate transport associated with the proposed project, comply with applicable regulations and requirements, including those pertaining to pilot licensure and tug escort requirements.</p> <p>The Draft EIS discusses the requirements for using licensed Puget Sound pilots and tug escorts in the following sections:</p> <ul style="list-style-type: none"> • Marine vessel safety – Section ES7.11.2 • Regulatory requirements – Section 13.1 • Pilot and tug escort requirements – Section 13.4.1.2 <p>The Draft EIS discusses resources within the Salish Sea that could be impacted by the proposed project, including the San Juan Islands National Monument, in the following sections:</p> <ul style="list-style-type: none"> • Recreation and potential impacts to recreation – Sections 10.4.1 and 10.4.2 • Air quality – Section 4.4.4 • Wildlife and marine resources – Sections 6.4, 6.5, and 7.4 • Economics – Section 11.5.2.4

ID	Comment Text	Response
		<ul style="list-style-type: none"> • Cultural Resources – Section 12.4 <p>Additional information regarding potential impacts to the San Juan Islands National Monument and the San Juan Island National Historical Park on cultural resources is provided in Section 3.8.2 of this Final EIS. Additional information regarding potential impacts on environmental and economic resources is provided in Sections 3.3, 3.4, 3.5, and 3.9 of this Final EIS.</p> <p>SEPA requires the consideration of environmental impacts that are likely, not merely speculative (WAC 197-11-060(4)(a)). The potential impacts of the region’s brand in the event of a marine spill are speculative, and not quantifiable in nature, and are therefore not analyzed in the Draft EIS. Thus, the potential impacts to retirement home and vacation revenue were not analyzed in the Draft EIS. The Draft EIS does discuss potential impacts from spills on the beautiful environment, tourism, and fisheries in the following sections:</p> <ul style="list-style-type: none"> • Marine life, including fish – Section 7.4.2 and 7.4.3 • Tourism – Section 11.5.2 • Land and shoreline use – Section 10.3.2 • Recreation – Section 10.4.2 • Aesthetics and visual resources – Section 10.5.2 • Economics/employment income, including fisheries – Section 11.5.2.4 • Tribal fisheries and aquaculture – Section 11.5.2.4

The following individuals submitted the above form letter. Some individuals may have added additional comments to the standardized text. Those additions are not included here but are included in the relevant topic area comment response tables in this appendix.

Alexandra, Kathryn
Armon, Caroline
Blomberg, Irene
Brenner, Jari
Chapin, David
Crawbuck, Kenneth
Graville, Iris
Hartmann, Lorraine
Kane, Maureen
LeBaron, Nina
Lyke, Mary Lynn
Martyn, Deborah

Meehan, Camille
Nollman, Kathryn
Robinson, Roger
Sabin, Karla
Sherman, Laurie
Shubert, Stephen
Smoke, Eileen
Wentworth, Jane
Wilson, Chris
Wilson, Jenny
Wood, Frances

Appendix B

Errata

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APPENDIX B: ERRATA

This appendix lists corrections to the text of the Draft Environmental Impact Statement that have the potential to change the meaning of the analyses. Typographical errors, such as spacing, punctuation, or minor grammatical errors, are not included.

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section ES5.3, Proposed Project; page ES-11	Figure ES-4: Proposed Project Infrastructure	Rename figure to: Figure ES-4: Proposed Project Components
Section 1.4, Environmental Review Process; page 1-5	Figure 1-3: EIS Process	Rename figure to: Figure 1-3: EIS Process and Timing
Section 2.6.1, Naptha Hydrotreater Expansion; page 2-12	The location of the NHT expansion is shown on Figure 2-8.	Revise sentence to: The location of the NHT expansion is shown on Figures 2-2 and 2-8
Section 2.6.2, New Isomerization Unit; page 2-14	The location of the Isom Unit is shown on Figure 2-8.	Revise sentence to: The location of the Isom Unit is shown on Figures 2-2 and 2-8.
Section 2.6.2, New Aromatics Recovery Unit and New Boiler; page 2-14	The location of the ARU is shown on Figure 2-8.	Revise sentence to: The location of the ARU is shown on Figures 2-2 and 2-8.
Section 2.6.3, New Aromatics Recovery Unit and New Boiler; page 2-15	A new, natural-gas-fired boiler and associated feedwater tank would be installed to the ARU to provide process heat needed for the proposed project	Revise sentence to: A new, natural-gas-fired boiler and associated feedwater tank would be installed in the northwest quadrant of 8th Street and E street, adjacent to the ARU to provide process heat needed for the proposed project
Section 2.7.4, Construction Vehicle Traffic; page 2-13	An SPMT is a platform vehicle with a large array of wheels (see Figure 2-17).	Correct figure is Figure 2-16: Proposed Heavy Haul Route
Section 2.9.2.6, New Tanks Area; page 2-51	The site selected for the new tanks (New Tanks Area on Figure 2-20) would be located in relative close proximity to the existing industrial process units resulting in energy savings and operational efficiencies.	Correct figure is Figure 2-22: Alternate Site Considered

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section 3.4.2.1, Impacts from Earthquakes; page 3-28	Taking into consideration the 10 to 17 percent probability of a geologically detectable earthquake from the CSZ (i.e., a rupture of the CSZ) within 50 years, proposed project structures would be built using applicable design requirements to withstand such an event as required by the International Building Code. While the risk of impacts from earthquakes cannot be completely eliminated, these measures would reduce the risk of an earthquake causing the collapse of a building, fire or explosion, or rupture of secondary containment.	Insert between sentences in original text: In addition, the New Tanks Area would be regulated under the Facility Oil Handling Standards (WAC 173-180) and the secondary containment structures in this area would also be subject to WAC 173-180-320, including the seismic design requirements at WAC 173-180-320(9).
Section 4.2.1, Study Area; page 4-7	Figure 4-1: Area of Influence	Rename figure to: Figure 4-1: Area of Influence for Air Quality
Section 4.4.7, Summary of Potential Impacts on Air Quality and GHG, Table 4-14; page 4-24	Increased emissions of ozone and GHGs could cause an exceptional event of greater than 87,400 metric tons of GHG. However, increases in GHG and air emissions would be temporary and short term, and marine spills would have a low likelihood of occurring.	Revise sentences to: However, increases in air emissions would be temporary and short term, and marine spills would have a low likelihood of occurring.
Section 5.3.1, Affected Environment; page 5-10	Both systems are directed to the refinery’s Wastewater Treatment Plant (WWTP) and managed under the NPDES Industrial Wastewater Discharge Permit under Outfall 001 (see Figure 5-1).	Revise sentence to: Both systems are directed to the refinery’s Wastewater Treatment Plant (WWTP) and managed under the NPDES Industrial Wastewater Discharge Permit under Outfall 001 at the end of the wharf.
Section 5.3.2.1, Impacts on Surface Water from Construction; page	Additional details regarding construction BMPs are provided in the proposed project’s NPDES Construction Storm Water Permit (see Appendix 2-B, NPDES Permit) and are discussed in Chapter 2, Proposed Action and Alternatives.	Revise sentence to: Additional details regarding construction site controls are discussed in Chapter 2, Proposed Action and Alternatives.
Section 5.3.2.2, Impacts on Surface Water from Operations and Maintenance; page 5-20	The treated water is then discharged to marine waters (see Chapter 7, Marine and Nearshore Resources). The controlled drainage areas and outfalls are shown on Figure 1 in Appendix 2-A, Existing Programs and Operations.	Replace both sentences with: The treated water is then discharged to marine waters through Outfall 001 located at the end of the refinery wharf.
Section 5.5.2.1, Impacts on Wetlands from Construction; page 5-39	Due to the low function level of the adjacent wetlands, and in consideration of implementation of engineering controls and BMPs described above and in Section 5.4.2, the impact on wetlands from construction of the proposed project could be less than significant.	Correct section reference is Section 5.3.2, Potential Impacts on Surface Water

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section 6.3.2.2, Marine Vessel Transportation Route; Table 6-5; page 6-17	Not applicable	Add additional row at the end of the table: Common Name: Osprey. Scientific Name: <i>Pandion haliaetus</i> . Federal Status: Migratory. State Status: –. Source: IPaC Distribution. Species Information: The species occurs along large water bodies, fresh or salt, in lower-elevation forested habitats. Nests are built on dead trees or artificial structures, always near water. The species feeds almost exclusively on fish. The study area is within the species’ breeding range (Audubon 2017) ¹ . Habitat Evaluation: This species uses artificial structures for nesting; therefore the study area may contain suitable nesting sites. Nearshore and marine habitats in Padilla and Fidalgo Bays are likely to provide valuable foraging habitat for breeding birds.
Section 6.4.4, Summary of Potential Impacts on Terrestrial Vegetation and Wildlife; page 6-32	In summary, all potential impacts on terrestrial vegetation and wildlife were evaluated as less than significant.	Revise sentence to: In summary, all potential impacts on terrestrial vegetation and wildlife were evaluated as less than significant, with the exception of marine birds. In the event of a worst-case or maximum most probable spill, impacts to marine birds would be potentially significant.
Section 7.2.1, Study Area; page 7-8	The marine vessel transportation route and adjacent waters and shorelines from the Tesoro Anacortes Refinery wharf structure to the edge of U.S. territorial waters in the Pacific Ocean, approximately 12 nautical miles seaward of the entrance to the Strait of Juan de Fuca (see Figure 2-3 in Chapter 2, Proposed Action and Alternatives).	Correct figure is Figure 2-4: Marine Vessel Transportation Route from the Refinery to the Pacific Ocean
Section 7.3.3.6, Groundfish; page 7-32	Table 7-9 outlines the special status rockfish species identified or managed under state and federal regulations.	Change “special status rockfish” to “special status groundfish”
Section 7.3.3.5, Groundfish; page 7-32	Critical habitat for these species is designated in nearshore areas and other shallower areas throughout the study area (see Figure 7-4)	Revise sentence to: Critical habitat for these species is designated in nearshore areas and other shallower areas throughout the study area.
Section 7.3.3.10, Marine Mammals; page 7-41	Figure 7-7 Sea Lion Haulout Sites Adjacent to the Proposed Project Area	Rename figure to: Figure 7-7:Pinniped Haulout Sites Adjacent to the Proposed Project Area
Section 7.4, Potential Impacts on Marine and Nearshore Resources; page 7-43	The impacts analysis is presented below and is summarized in Section 7.4.3.3.	Correct section reference is Section 7.4.4, Summary of Impacts on Marine and Nearshore Resources

¹ Audubon. 2017. Guide to North American Birds: Osprey. Accessed: June 2017. Retrieved from: <http://www.audubon.org/field-guide/bird/osprey>

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section 7.4.1.4, Release of Sediment to Coastal Waters; page 7-46	The treated water is then discharged to Fidalgo Bay via Outfall 001 at the end of the wharf, as prescribed in the refinery’s NPDES Industrial Wastewater Discharge Permit (see Figure 1 in Appendix 2-A, Existing Programs and Operations, and Permit WA0000761 in Appendix 2-B).	Revise sentence to: The treated water is then discharged to Fidalgo Bay via Outfall 001 at the end of the wharf, as prescribed in the refinery’s NPDES Industrial Wastewater Discharge Permit (see Permit WA0000761 in Appendix 2-B).
Section 7.4.1.5, Noise; page 7-49 (note to Table 7-16)	See Appendix 7-A, Noise Attenuation Modeling Results, for a description of the metrics presented here.	Delete table note
Section 7.4.2.6, Noise; page 7-53	Noise can directly and indirectly impact marine wildlife through a number of mechanisms, as described in Section 7.1.1.1.	Correct section reference is Section 7.4.1.5, Noise
Section 7.4.2.6, Noise; page 7-53	Less intense noise sources, such as marine vessel operation, can elicit behavioral responses. Underwater noise from marine vessel operation associated with the proposed project could exceed behavioral thresholds defined by NOAA (see Table 7-15) within approximately 1 mile of marine vessels for fish, approximately 3.5 miles for pinnipeds, and up to approximately 5 miles for cetaceans (see Appendix 7-A, Noise Attenuation Modeling Results).	Delete reference to Appendix 7-A
Section 7.4.3.2, Marine Spills during Operations; page 7-55	The material would never dissolve deep enough into the water to reach benthic communities; therefore, this exposure pathway is not shown on Figure 7-8.	Revise sentence to: The material would never dissolve deep enough into the water to reach benthic communities; therefore, this exposure pathway is shown as incomplete on Figure 7-8.
Section 9.2.1, Study Area; page 9-2	Those living within the area evaluated for increases in air pollution shown on Figure 4-1 in Chapter 4, Air Quality and Climate Change.	Revise sentence to: Those living within the area evaluated for potential air quality impact shown on Figure 4-1 in Chapter 4, Air Quality and Climate Change.
Section 9.2.1, Study Area; page 9-2	The traffic study area includes the routes used during construction for the haul of infrastructure from the Port of Anacortes...	Revise sentence to: The traffic study area includes the routes used during construction for the haul of major project component from the Port of Anacortes...
Section 9.4.1, Affected Environment; page 9-13	Figure 9-1 Average Annual Daily Traffic in the Vicinity of the Proposed Project Site 2015	Rename figure to: Figure 9-1-: Average Annual Daily Traffic in the Vicinity of the Proposed Project Site in Year 2015
Section 9.3.1.2, Health Conditions Associated with Air Pollution Exposures; pages 9-5 & 9-6	As shown on Figure 11-3 and 11-5 in Chapter 11, Social and Economic Environment, there are no census blocks in the vicinity of the proposed project with high levels of poverty in comparison to the rest of the state of Washington.	Correct figure references are Figure 11-2: EJSCREEN Output: Low-Income Population, Project Area and Marine Vessel Transportation Routes and Figure 11-4: EJSCREEN Output: Low-Income Population, Immediate Project Area

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section 9.6.1, Potential Impacts on Health from Fires at the Refinery During Operations and Maintenance; page 9-27	For example, Figure 2-7 in Chapter 2, Proposed Action and Alternatives, indicates that approximately 60 percent of the materials currently produced at the facility are gasoline and jet fuels, both these products are a 3 in the NFPA rating system.	Revise sentence to: For example, Figure 2-7 in Chapter 2, Proposed Action and Alternatives, indicates that more than 70 percent of the materials currently produced at the facility are gasoline and jet/diesel fuels; both these products are a 3 in the NFPA rating system.
Section 9.6.2.4, Impacts on Health from Marine Spills from Vessels during Operations; call-out box on page 9-34	In Louisiana in 2007, a 1,000–bbl xylene spill to water occurred from a barge–vessel collision on the Mississippi River.	Change date of spill from 2007 to 2003
Section 9.6.2.4, Impacts on Health from Marine Spills from Vessels during Operations; page 9-35	In addition, spill response resources (both equipment and personnel) are available to respond immediately in the event of a spill throughout the study area as described in Chapter 13, Section 13.5.2.2.	Correct section reference is Section 13.5.7, Spill Response
Section 10.2.1, Study Area; page 10-4	The study area for marine transportation includes the marine vessel transportation route and adjacent waters and shorelines from the Tesoro Anacortes Refinery wharf structure to the edge of U.S. territorial waters in the Pacific Ocean, approximately 12 nm seaward of the entrance to the Strait of Juan de Fuca (see Figure 2-3 in Chapter 2).	Correct figure reference is Figure 2-4: Marine Vessel Transportation Route from the Refinery to the Pacific Ocean
Section 10.2.1, Study Area; page 10-5	Table 10-2: Study Areas for Land Use and Shoreline Use	Change table title to: Table 10-2: Study Areas for Land Use and Shoreline Use, Recreation, and Visual Resources
Section 10.2.1, Study Area; Table 10-2; page 10-5	Land in the vicinity of the proposed project area, within the refinery boundary and adjacent to North Texas Road; shoreline along March Point and Fidalgo Island; and coastlines and waterways within the Salish Sea along the marine vessel transportation route (Figures 2-2 and 2-3). ALSO: Recreation resources on March Point and the shoreline of Fidalgo Island, as well as open water and shorelines along the marine vessel transportation route (Figures 2-2 and 2-3).	Correct figures references are Figure 2-2: Project Area and Vicinity Map, and Figure 2-4: Marine Vessel Transportation Route from the Refinery to the Pacific Ocean
Section 10.2.2.3, Visual; page 10-7	The VRM system (BLM 1978) characterizes existing landscapes on lands under BLM jurisdiction, identifies and evaluates the scenic values of those lands, determines visual impacts from projects, and ultimately determines the appropriate level of management of visual resources on BLM lands.	Change citation to BLM 1984

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section 10.4.2.3, Impacts on Recreation from Vessel Traffic during Operations; page 10-36	The marine vessel transportation route includes passage through the Strait of Juan de Fuca and its approaches, Rosario Strait, Guemes Channel, and Fidalgo Bay and Padilla Bay (Figure 2-3).	Correct figure reference is Figure 2-4: Marine Vessel Transportation Route from the Refinery to the Pacific Ocean
Section 10.5.2.1, Impacts on Aesthetics and Visual Resources from Construction; page 10-44	Visual impacts during construction would be temporary, and would be localized to certain areas depending on the particular phase of construction (see Figure 2-9).	Correct figure reference is Figure 2-13: Project Construction Phase Durations
Section 10.5.2.1, Impacts on Aesthetics and Visual Resources from Construction; page 10-45	Storage, laydown, and other areas used for temporary construction activity would also occur mostly within developed areas of the refinery including construction office and trailers, pipe and column storage areas, general project material laydown areas, and fabrication areas (see Figure 2-13).	Delete reference to Figure 2-13.
Section 10.7, References; page 10-55	BLM (Bureau of Land Management). 1978. Visual Resource Management. BLM Manual 8400. Washington, D.C.: U.S. Department of the Interior.	Change date of reference to 1984
Section 11.3.2, Potential Impacts on Housing; page 11-7	Potential impacts on social and economic resources are summarized in Section 11.3.3.	Correct section reference is Section 11.2.2, Summary of Potential Impacts on Housing
Section 11.5.1.2, Cattle Ranching and Farming; page 11-20	That sector generates \$90.3 in annual employment income within Skagit County comprising 4.6 percent of the county total (Table 11-8). Cattle ranching and farming generates \$6.7 million in annual employment income, 7.5 percent of annual employment income from NAICS Sector 11 and less than 1.0 percent of total wage income in Skagit County (BLS 2016a-c, e, f)	Change \$90.3 to \$90.3 million; change 7.5 percent to 7.4 percent.
Section 11.5.1.4, Commercial Fisheries; page 11-21	Fishing generates \$5.1 million in annual employment income, 4.2 percent of annual employment income from NAICS Sector 11, and less than 1.0 percent of total wage income generated in the MS study area (BLS 2016a-c, e, f; Table 11-8).	Change 4.2 percent to 4.4 percent in annual employment income
Section 11.5.1.7, Marine Transportation; page 11-25	Of these, approximately 4 of every 5 port calls are made by large commercial vessels, while the remaining calls are made by tank ships and ATBs (see Chapter 13, Marine Transportation, Table 13-5).	Correct table references are Table 13-3: Salish Sea Vessel Call Data 1999 to 2013 and Table 13-4: Vessel Crossings by Waterway, 2010-2014

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section 11.8, Cumulative Impacts; page 11-43	This increase would not significantly reduce waterway access to commercial fishermen, or to tribal fishers for commercial, subsistence, or ceremonial purposes. Similarly, cumulative increase in marine vessel traffic would not significantly reduce access to marine plants currently gathered as part of tribal aquaculture activities.	Delete sentences
Section 13, Marine Transportation; Table 13-1; page 13-1	Not applicable	Add additional row: 33 CFR Part 110. Identifies and establishes the rules and regulations for anchorage grounds and gives the USCG Captain of the Port (COTP) the authority to regulate activity within those anchorage grounds (§110.230 applies to the Puget Sound zone).
Section 13.2.1, Study Area; page 13-5	The study area for marine transportation includes the marine vessel transportation route and adjacent waters and shorelines from the Tesoro Anacortes Refinery wharf structure to the edge of U.S. territorial waters in the Pacific Ocean, approximately 12 nautical miles (nm) seaward of the entrance to the Strait of Juan de Fuca (see Figure 2-3 in Chapter 2, Proposed Actions and Alternatives).	Correct figure reference is Figure 2-4: Marine Vessel Transportation Route from the Refinery to the Pacific Ocean
Section 13.2.3.3, Marine Spills; page 13-8	Section 13.5.2.1 discusses the historic and predictive data related to the likelihood of various spill events and associated spill volumes, and defines the spill volume categories evaluated in this Draft EIS. Section 13.5.2.2 provides a detailed description of spill modeling methodology. Section 13.5.2.3 defines the impact magnitude for criteria in terms of spill thickness.	Revise text to: Section 13.5.6 discusses the historic and predictive data related to the likelihood of various spill events and associated spill volumes, and defines the spill volume categories evaluated in this Draft EIS. Section 13.5.4 provides a detailed description of spill modeling methodology. Section 13.5.4.3 defines the impact magnitude for criteria in terms of spill thickness.
Section 13.3.2.2, Impacts on Vessel Traffic from Operations; page 13-14	The increase in vessel traffic as a result of the proposed project would represent a traffic increase of 0.1 percent...	The increase in vessel traffic would represent a traffic increase of less than 0.1 percent in Guemes Channel.
Section 13.3.2.3, Impacts on Vessel Traffic from Spills and Spill Response; page 13-15	Under the worst-case spill scenario along the marine vessel transportation route (see Section 13.5.2.3), vessel traffic could be restricted from an area estimated at up to 23.5 square miles within the study area for up to 3 days due to a spill and spill response.	Correct section reference is Section 13.5.3, Spill Scenarios and Regulatory Requirements
Section 13.4.1.1, Marine Casualty and Vessel Incident Data; page 13-18	The generalized categories listed in Table 13-11 (unknown cause, other, or miscellaneous vessel type) accounted for the largest share of incidents.	Update sentence to read: “The generalized categories listed in Table 13-11 (cause type unknown and vessel types other and miscellaneous)...”

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Section 13.4.2.3, Impacts on Vessel Safety from Spills and Spill Response; page 13-32	As described in Section 13.5.2.3, a worst-case spill scenario could result in the temporary, complete blockage of one or more waterways or port facilities, while the other spill scenarios would result in smaller blockages. Vessels in the Salish Sea may be required to take alternate routes or to temporarily halt their journeys.	Correct section reference is Section 13.2.3.2, Impacts on Vessel Traffic from Spills and Spill Response
Section 13.5.5.1, Worst-Case Spill Modeling Results; page 13-44	The full set of diagrams are presented in Appendix 13-B, Figures. Each figure includes up to six sub-parts, one for each of the tidal and wind scenarios listed in Appendix 13-B.	Revise text to: The full set of diagrams is presented in Appendix 13-B, Appendix Figures 13-1 to 13-48. Each figure includes up to six sub-parts, one for each of the tidal and wind scenarios listed in Table 13-15.
Section 13.5.5.2, Maximum Most Probable and Average Most Probable Spills; page 13-52	Each figure includes up to six sub-parts, one for each of the tidal and wind scenarios listed in Tables 13-18 through 13-21.	Correct table references are Tables 13-21 through 13-24
Page 13.5.6, Spill Likelihood; page 13-62	As described in Section 14.1.1.1, spills are more likely to occur during product transfers, such as those at the refinery wharf.	Correct section reference is Section 13.4.1.1, Marine Casualty and Vessel Incident Data
Page 13.5.6, Spill Likelihood; page 13-62 (note to Table 13-28)	This table isn't specific to the modeling locations outlined in Section 13.4.4.2.	Correct section reference is Section 13.5.4.4, Modeled Spill Locations
Section 13.5.7, Spill Response; page 13-63	These caches are shown in the spill modeling diagrams in Section 13.5.2.2.	Change section reference to Figures 13-12 through 13-15
Section 13.5.7, Spill Response; page 13-65	The location of spill response equipment, including boat launch locations, staging areas, and an identification of whether the location has a specific spill notification strategy, are included on the figures in Section 13.5.2.4 and 13.5.2.5.	Change section references to figure references: Figures 13-12 through 13-15
Section 13.5.8, Summary of Potential Impacts from Spills; page 13-66	The conclusions from these chapters for the worst-case, maximum most probable, and average most probable spill scenarios are summarized in Tables 13-25 and 3-26, respectively.	Correct table references are Table 13-29: Summary of Potential Impacts from the Worst-case and Maximum Most Probable Spill Scenarios and Table 13-30: Summary of Potential Impacts from the Average Most Probable Spill Scenario
Section 13.5.8, Summary of Potential Impacts from Spills; page 13-11-67	Tribal fisheries and aquaculture row	Delete entry
Section 13.6.1.2, Spill Risks; page 13-71	As shown in Table 13-32, additional annual vessel calls in the greater Salish Sea could increase the risk of spills.	Correct table reference is Table 13-31: Increase in Spill Likelihood–Puget Sound 2015 Vessel Traffic Risk Assessment

Relevant Section(s)/Pages in the Draft EIS	Original Text	Correction
Chapter 15, Distribution List; page 15-1	Table 16-1 provides a list of agencies, tribes, and organizations who were notified of the availability of the draft EIS for viewing and download by email.	Change table reference section reference: Section 15.1, Table–Draft Notification List
Chapter 15, Distribution List; page 15-1	Table 16-2 provides a list of public reading room locations.	Change table reference to section reference: Section 15.2, Public Reading Rooms

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Appendix C

Additional Information Provided by Applicant

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Request from Skagit County:

Please provide information regarding existing and/or ongoing spill response planning and coordination with local communities, including La Conner and Anacortes, among others.

Response by Tesoro (5/17/17):

Tesoro has been actively engaged in spill response planning and coordination with our local communities for many decades. The six major areas of our local involvement include the following:

1. Spill preparedness and response¹
2. March Point Community Awareness Emergency Response (CAER) Group
3. Mutual aid agreements
4. Anacortes Community Tesoro Advisory Group (CTAG)
5. Community Investment into Emergency Response and Preparedness
6. Local emergency planning committee (LEPC)

The information below highlights the areas in which Tesoro participates directly and does not include other community spill preparedness and response trainings offered through others (including state, local, non-profits sponsored trainings).

1. Spill preparedness and response

Annual spill drill participation and observation

Tesoro conducts spill drills and training regularly, including an annual training and table-top exercise, and has a long-standing reputation of involving the community in that exercise. During the event, the Skagit County Department of Emergency Management and Tribal governments provide representation as members of the Unified Command. Additionally, there are many local groups and individuals who actively participate in various roles during the spill exercise including the Samish and Swinomish Tribes, Island Oil Spill Association (IOSA), local representatives from Washington State Fish and Wildlife among others. The Anacortes Police Department, Mount Vernon Police Department, Skagit County Sheriff's Department, and Skagit County Emergency Management routinely attend drills. Local governments and non-government organizations can contact Tesoro anytime if they are interested in participating or observing a spill drill. We are always interested and willing to expand participation in this annual event to other members of the community based upon local interests and needs.

Partnering with our community agencies and tribes

Tesoro has a long-standing partnership with IOSA, a non-profit 501(c)4 organization, that provides the following services:

- Initial 2 and 3 hour site safety assessment in San Juan County in the event of a spill,
- Spill exclusion/containment,

¹ Refer to Draft EIS, p 17, Ecology Drill Program WAC 1730182-700 and 710

- Geographic Response Plan (GRP) deployment in San Juan County and surrounding waters, as well as,
- Wildlife rescue services in Washington State, with 24 hour notification through San Juan County sheriff's dispatch.

Additionally, last year Tesoro partnered with the Swinomish Tribe to develop and test a GRP. On March 24, 2016, fieldwork was conducted, in partnership with the Washington State Department of Ecology, Tesoro, Marine Spill Response Corporation (MSRC), and the Swinomish Tribe to research potential deployment strategy locations along the Swinomish Channel. On June 2, 2016, this same group tested three (3) deployment strategies along Swinomish Channel to test feasibility.

2. March Point Community Awareness Emergency Response (CAER) Group

Since 1985, several industries on March Point have been associated in an organization established to enhance awareness of local chemical and petroleum industries. The organization is called CAER which stands for Community Awareness & Emergency Response. The industry representatives of CAER are Tesoro Refining & Marketing Company LLC, Shell Puget Sound Refinery, ChemTrade, Air Liquide, and Linde. Other members include the Skagit County Department of Emergency Management, Summit Park Fire Department District #13 (including Hope Island and Snee-oosh Stations), City of Anacortes Fire Department, Swinomish Tribe, Fire Department District #11 (Dewey Beach & Mount Erie), Skagit 911 center, Skagit Regional Hospital, Island Hospital and additional ad doc members.

The purpose of CAER is to prepare an Emergency Response Plan that can be used by community leaders in time of need. The March Point CAER group meets routinely (bi-monthly) and conducts annual drills.

In 1998, the March Point CAER group initiated the first automatic community emergency alert system in Skagit County. Today the program, called *AlertSense*, is operated by Skagit 911, funded annually by Tesoro and Shell, and serves as a community emergency alerting and critical communication service for Skagit County.

3. Mutual Aid Agreements

Tesoro actively also supports emergency response preparedness, education and training in the community by providing multiple opportunities each year for local municipal emergency responders to attend Tesoro-sponsored emergency response training (Fire Training, Rescue Training, Incident Comment Training, HAZWOPER Training). Tesoro sponsors 2 to 5 openings per class (with 6-8 class offerings per year) for municipal emergency responders, paying for both the training class and full travel expenses.

Tesoro offers both human and physical resources to respond to community emergencies. A recent example includes responding to the Tommy Thompson Trail trestle fire, during which Tesoro's response boat and personnel were instrumental in providing skill and resources to extinguish the fire.

Tesoro's new response boat, the *Tara Jane*, was called into action to provide stand-by support in response to a recent beach fire at Cap Sante. There are more historical examples that could be

referenced where Tesoro has responded to support the community, but the bottom-line is that Tesoro actively supports the local community in responding to events, and local community leaders regularly call on Tesoro for assistance.

Tesoro also holds mutual aid agreements with the other petroleum refineries in Washington State, through which Tesoro would provide assistance to respond to events both inside and outside the Anacortes and Skagit County area.

4. Anacortes Community Tesoro Advisory Group (CTAG)

The Anacortes Community Tesoro Advisory Group (CTAG) was created in 2013. The CTAG is an independent advisory group comprised of residents from the communities surrounding the refinery who serve as an interface between the management of the Anacortes Refinery and the local communities. The CTAG strives to ensure a diverse membership that fairly represents the surrounding communities. Current and past members have included local builders, retirees, restaurateurs, academics, community organizers, tribal members, educators and others. The CTAG meets each month and works with Tesoro leaders to learn about the refinery's operations and plans, including its spill response and preparation, while communicating to Tesoro questions and concerns from the local communities.

Tesoro is committed to doing business in a way that facilitates community involvement, two-way communication and mutual respect. The CTAG is an important advisory group and Tesoro actively responds to their recommendations and concerns.

The CTAG developed the following Vision and Mission Statements to guide their actions:

Vision Statement

To be an independent source for a credible and productive relationship between Tesoro and the neighboring communities.

Mission Statement

Act as an independent group to work for the community's welfare. Advise and inform Tesoro and the community with fact-based information. Voice the community's questions, concerns and recommendations to Tesoro management

5. Community Investment into Emergency Response and Preparedness

At Tesoro, safety is our top priority. We are committed to operating our refineries, pipelines, retail stations and other facilities in a manner that promotes the health and safety of our employees and customers and are focused on making our communities stronger, safer places to live, work and play.

We provide funding, equipment and support to first responders, government agencies and community-based organizations to increase the overall safety of the communities where Tesoro operates. Preference is given to projects and organizations that help communities better prepare for, mitigate the risks of and respond to disasters, hazards and emergencies.

Some examples of our recent support to agencies in Skagit County include:

- \$40,000 grant to the Anacortes Police Department to purchase two new patrol vehicles for the Anacortes Citizens Auxiliary Patrol.
- \$25,000 grant to the American Red Cross for their “Home Fire Campaign” to install fire alarms in lower socio-economic housing units in the City of Anacortes with support from the Tesoro fire brigade and the Anacortes Fire Department.
- \$78,000 grant to Skagit 911 to provide a back-up power source to multiple mission critical public safety radio communications sites in Skagit County that will enable local 911 services to remain functional during extended power outages.
- \$20,000 grant to the Big Lake Firefighters Association to purchase Air Packs and Air Mask Upgrades as well as a new Forward Looking Infrared (FLIR) device to assist in fire responses.
- \$15,000 grant to the Island Hospital Foundation to provide advanced burn life support training to local first responders.
- \$500,000 grant to the American Red Cross for the purchase of two Emergency Response Vehicles based in Mt. Vernon and Vancouver which will serve the entire Pacific Northwest region.
- \$25,000 grant to the Skagit County Fire Protection District #2 for critical communications equipment upgrades.
- \$2,000 grant to the Big Lake Firefighters Association to purchase a portable generator and light set for nighttime emergency responses.
- \$37,000 grant to the Skagit County Fire District 13 for critical Patient Transport Equipment which serves the La Conner community as well as the surrounding communities via a mutual aid agreement between the neighboring emergency response agencies.
- \$1,200 grant to the Anacortes Police Department for the purchase of a patrol bicycle that will be used by the local School Resource Officer during the school year and used to patrol the local forest lands during the summer.
- \$16,000 grant to the Anacortes Fire Department for new hydraulic extrication tools for emergency response activities in Anacortes and surrounding communities.

6. Local Emergency Planning Committee (LEPC)

Tesoro has been an active member of the Skagit County Local Emergency Planning Committee (LEPC) for decades. The LEPC is a committee mandated by Title III of the Superfund Amendments and Reauthorization Act of 1986. It is comprised of representatives from industry, government, environmental groups and others. The LEPC receives information each year from businesses storing

and/or using hazardous materials in excess of the thresholds established by the Environmental Protection Agency. These businesses must report this information to the LEPC, their local fire department and to the Washington State Department of Ecology. Any business that uses, manufactures, stores or transports hazardous materials is required to have procedures for the safe handling of these materials as well as emergency response procedures. LEPCs must develop an emergency response plan, review the plan at least annually, and provide information about chemicals in the community to citizens. Plans are developed by LEPCs with stakeholder participation. There is one LEPC for each of the more than 3,000 designated local emergency planning districts. The community emergency response plan prepared by the LEPC includes:

- Identification of facilities and transportation routes of extremely hazardous substances
- Description of emergency response procedures, on and off site
- Designation of a community coordinator and facility emergency coordinator(s) to implement the plan
- Outline of emergency notification procedures
- Description of how to determine the probable affected area and population by releases
- Description of local emergency equipment and facilities and the persons responsible for them
- Outline of evacuation plans
- A training program for emergency responders (including schedules)
- Methods and schedules for exercising emergency response plans

Fire departments and other response agencies are also required to have procedures in place for hazardous materials spills. The Skagit LEPC has set up a Community Right to Know Program which incorporates the chemicals reported to the LEPC by local businesses.

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