



# Tesoro Anacortes Clean Products Upgrade Project ENVIRONMENTAL IMPACT STATEMENT



## Scoping Report

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## Acronyms and Abbreviations

ARU	Aromatics Recovery Unit
BNSF	BNSF Railway
CPUP	Clean Products Upgrade Project
DS	Determination of Significance
EIS	Environmental Impact Statement
GHG	Greenhouse gas
ISOM Unit	Isomerization Unit
MVEC	Marine Vapor Emission Control
NHT	Naphtha Hydrotreater Unit
SEPA	State Environmental Policy Act
Tesoro	Tesoro Refining & Marketing Company, LLC
U.S.	United States of America
VCU	Vapor Combustion Unit

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## Introduction

### How to use this report

Skagit County is the lead agency for preparation of the Tesoro Refining & Marketing Company, LLC (Tesoro) Clean Products Upgrade Project (CPUP) Environmental Impact Statement (EIS) under the State Environmental Policy Act (SEPA). An EIS is a document that provides impartial, comprehensive discussion of a proposed project's likely significant adverse impacts, reasonable alternatives, and proposed measures to avoid or minimize impacts.

The purpose of scoping is to focus EIS studies on a project's potentially significant impacts, eliminate insignificant impacts from detailed study, and identify alternatives for analysis. Scoping gives the public, agencies, and tribes the opportunity to provide comments that help shape the EIS.

This report distills the comments into key themes, giving equal weight to each issue and concept; it does not contain all comments received verbatim nor does it quantify comments by topic.

*Please also note that comments often mix statements of fact with statements of opinion, and as a result this report may include inaccurate or incomplete information in the form it was provided by commenters.*

All comments received during the scoping comment period are posted on the project website:

[TesoroAnacortesEIS.com](http://TesoroAnacortesEIS.com)

Scoping comments will be used by the lead agency to help determine the issues and extent of the analysis to be included in the Tesoro Anacortes CPUP EIS, as well as options for reasonable alternatives to the proposed project and mitigation measures that could be considered. Skagit County and their consultants will have the opportunity to review comments as they develop the draft EIS.

### Proposal overview and context

The Tesoro Anacortes refinery is located in western Skagit County on March Point, along the western edge of Padilla Bay and the eastern edge of Fidalgo Bay. Site zoning allows for its development in the unincorporated urban growth area of the City of Anacortes. City zoning identifies this area for heavy manufacturing.

Tesoro proposes additions and upgrades to its existing facility in order to produce 15,000 barrels per day of mixed xylenes and to supply cleaner fuels for local transportation. Mixed xylene is a compound found in gasoline and is used to make clothing, plastics, and other synthetic products. The proposal includes:

- Building a Marine Vapor Emissions Control (MVEC) system to capture vapors from marine vessels that come to the dock. The MVEC would involve a small unit on the dock, a new natural gas line along the dock, and a small unit on the shore.
- Constructing an Aromatics Recovery Unit (ARU) to produce mixed xylenes.
- Adding an Isomerization Unit (ISOM Unit) to make additional light hydrocarbons and increase the amount of octane available to the refinery.
- Expanding the Naphtha Hydrotreater Unit (NHT) to remove more sulfur compounds from gasoline.
- Installing a steam boiler to provide additional energy to operate the new units.
- Installing three storage tanks next to the existing tank storage area to hold reformate and xylenes.

## Scoping process

### Notification of scoping

#### Determination of Significance

On March 17, 2016, Skagit County released a Determination of Significance (DS) that stated Tesoro's proposed project, Tesoro Anacortes CPUP, may have a significant adverse impact on the environment and, therefore, required the development of an EIS under SEPA (Appendix A).

The scoping period began with the issuance of the DS. Washington State law mandates a 21-day public comment period for the scoping phase of an EIS. Upon release of the DS, Skagit County announced a 29-day scoping comment period scheduled to end on April 15, 2016. The notice also included announcement of a scoping meeting with a verbal public comment session scheduled in Anacortes, Washington, on March 31, 2016.

#### Public and media notification

Skagit County notified key stakeholders, interested parties, agencies, and the general public of the DS and scoping comment period using a variety of communication tools. Information provided to the public included:

- Announcement of the scoping comment period
- Description of the proposed project and area map
- Identification of Skagit County as the lead agency
- Proposed EIS process timeline
- Description of opportunities to provide scoping comments
- Details about the scoping meeting
- Link to the EIS scoping comment period online open house

The tools used to announce the release of the DS and start of the scoping period included (Appendix B):

- Email sent to 128 addresses, including:
  - Individuals who contacted Skagit County about the project during previous phases
  - Key stakeholders identified by Skagit County
  - Individuals who contacted Tesoro about the project prior to scoping
- Print and online ads placed in local papers (over 60,000 impressions)
  - Skagit Valley Herald
  - GoSkagit.com
  - Anacortes American
  - Journal of the San Juan Islands
- Notice posted on the Skagit County website

### Opportunities to provide comment

Skagit County invited comments through a variety of methods. The table below provides a count for the number of comments submitted during the scoping comment period using each option.

Method of submission	Number of comments submitted
Online open house comment form	119
Verbal public comment session	17
Voicemail	4
Email	2,046
Written (letters and comment forms)	317
<b>TOTAL</b>	<b>2,503</b>

**Online open house**

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 open houses, and then submit their scoping comments online. The site was live throughout the entire scoping comment period (March 17 – April 15, 2016). The online open house received more than 940 visits from 679 users during the scoping comment period.

Information provided through the online open house included the following topics:

- Proposed project
- EIS process
- Scoping
- Mixed xylenes
- Spill preparedness and response
- EIS topic areas
- Next steps in the environmental review

A Google Translate function embedded in the online open house allowed visitors to translate each web page to one of 90 languages. Information was also provided on ADA or visually impaired accommodations at the bottom of each web page. Lastly, the online open house provided an option on each web page to sign up for EIS process updates from Skagit County.

**Scoping meeting**

Skagit County hosted an in-person scoping meeting on March 31, 2016, at Anacortes High School. The scoping meeting included an open house with information about the proposed project and a verbal public comment session (see below). Forty-two people signed in at the open house meeting; other attendees declined the opportunity to sign in.

The scoping meeting open house featured eight stations (matching the online open house) with printed information related to the EIS process and proposed project. Skagit County and consultant staff were present at each station to answer questions and encourage people to submit a scoping comment. 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 handed out 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 scoping comments after the scoping meeting.

### Verbal public comment sessions

A verbal public comment session was held during the scoping meeting. The verbal public comment session was facilitated from 4:30 – 7 p.m. in a room separate from the concurrent open house. Eleven people provided verbal comments. A lottery system was used to determine speakers and their order. Each speaker was given up to two minutes to provide comments, which were documented by a court reporter. Each speaker had the option to comment up to three times.

### Voicemail

A toll-free number was available for people to call and leave a verbal comment. Each voicemail was limited to five minutes and transcribed for comment analysis. A total of four voicemails were received.

### Email

Stakeholders were encouraged to email [comment@TesoroAnacortesEIS.com](mailto:comment@TesoroAnacortesEIS.com) to submit their comments. Any emails received directly by staff during the comment period were reviewed and, if considered a scoping comment, forwarded on to this address for analysis. More than 2,000 comments were received by email during the scoping comment period.

### Written

Those who wished to provide written comments could either submit them at the scoping meetings, mail them to a post office box set up for this EIS process, or hand deliver them to Skagit County Planning and Development Services during regular office hours. A total of 317 written comments were received.

### Comment analysis process

The scoping period began March 17, 2016 and, after an extended scoping comment period of 29 days, closed on April 15, 2016. During this time, a total of 2,503 scoping comments were received through the various methods described in the previous section. All submissions were reviewed and analyzed to prepare this report. A copy of all scoping submissions received can be found on the project website: [TesoroAnacortesEIS.com](http://TesoroAnacortesEIS.com)

### Processing communications

The full text of all submissions was reviewed and entered into a single database for analysis. Analysts recorded the name and contact information of each commenter, the source of the submission, and other relevant details specific to each submission.

Once all submissions were entered into the database, analysts read each submission to identify and code unique comments. Comments were defined as unique concepts or ideas within a submission. Many submissions contained multiple comments. Each unique comment was assigned to one or more categories.

Each unique submission was reviewed at least twice: once by the primary coding analyst, and then again by a second analyst for quality assurance and control and/or during the preparation of this scoping summary. This process allowed for any discrepancies or inconsistencies to be resolved.

### Analysis methodology

To create this report, analysts queried the database to generate lists of comments organized by comment categories. Comments within each category were then summarized to capture the unique issues and concerns expressed by commenters.

For the purpose of this summary, every comment has been considered, whether it is stated only once or multiple times. The analysis represented in this report does not tally the number of comments received on any given topic, nor does it determine whether comments supported or opposed the proposed project. Scoping is designed to help identify issues that should be addressed and analyzed in the EIS and is not intended to function as a “voting” process.

## Public comments summarized by issue of concern

### Organization of this section

The following sections are organized into categories that reflect the issues and concerns heard during the scoping period. These issues and concerns are summarized and do not capture every comment for each category; they are not quantified. Quotes highlighted in the comment analysis are used to illustrate the range of comments received, but they may be opinions and are not intended to represent statements of fact.

### Geographic scope

Commenters requested that the EIS be conducted for a broad geographic scope inclusive of the full range of hazards, both local and across the landscape, impacted by the process of production and distribution. Commenters asked that the EIS address the “whole picture” and look at the entire scope and range of this expansion to review all potential impacts from the refinery site to the global implications of the project.

Commenters stated that the scope should include all tanker routes, taking into account stop-over places such as Vancouver Island, ports-of-call, and surrounding communities. Commenters noted that if the project could increase rail traffic, the EIS should include a study of rail line impacts even beyond the Anacortes rail subdivision. Commenters requested that the EIS consider the impacts related to extraction, transfer, storage, and transport of mixed xylenes, crude oil, and any other products associated with the CPUP.

### Comments summarized by topic

#### Air quality

Commenters asked that the EIS study the direct, indirect, and cumulative impacts of this project on air quality, including how emissions affect plants, animals, and people along the Salish Sea and tanker routes. This analysis should describe emissions, dust, and odors from the following potential sources:

- ARU (total emissions)
- Daily and annual emissions from all CPUP components
- Exhaust emissions from diesel-electric locomotives
- Exhaust emissions from marine vessels operating on the Salish Sea or moored at the loading dock
- Indirect sources such as rail traffic, trucks, and ships
- Isom Units (total emissions)
- MVEC Emissions (due to displaced marine vessel vapors, assist gas, and total emissions)
- Vapor Combustion Unit (VCU)

- Xylene<sup>1</sup> Oil Storage Tank (toxic air pollutant emissions and emission rates)

Commenters would like the EIS to include impacts to ambient air quality for both criteria and toxic pollutants. For each of the above sources, commenters would like to know the emission standards, how the standards are chosen, and the process for monitoring and enforcing the standards. Commenters asked if the project would include odor control mechanisms.

Commenters stated that the upgrades would improve the air quality at the refinery and improve the quality of Tesoro's gasoline. Other commenters noted that xylene is listed by the federal Agency for Toxic Substances and Disease Registry, a division of the United States (U.S.) Centers for Disease Control and Prevention, for several known health risks. Commenters mentioned that xylene is odorless and colorless and monitoring is required to identify and track emissions from leaks or system malfunctions. Commenters asked what happens to xylene vapors as they evaporate after a spill, specifically where they go and what harm they may cause.

Commenters expressed concern about wind patterns and how they may move emissions from the project. Commenters noted that winds often travel from the east across Fidalgo Bay. Other commenters stated that the prevailing winds from Anacortes to the San Juan Islands blow east to west and were concerned for those living in the path of the prevailing winds. Commenters asked about the likelihood of emissions from CPUP to impact federal Clean Air Act Class I areas such as the North Cascades National Park, Pasayten Wilderness, Glacier Peak Wilderness (to the East and generally downwind of the Tesoro refinery), and the Alpine Lakes Wilderness (to the southwest of the refinery).

Commenters stated that the Tesoro refinery expansion could potentially lead to overall increases in emissions of volatile organic compounds, mono-nitrogen oxides, and ozone. They asked that the EIS clarify the extent to which overall facility emission levels would change and the potential for exceedances of the National Ambient Air Quality Standards for these pollutants, including within the Swinomish Reservation. Commenters would like the EIS to address the risk of photochemical reactions producing ozone and other air pollutants.

Commenters asked how much sulfolane is allowed to be discharged under the pollution permits, if the Tesoro refinery has been fined for illegal sulfolane discharges, and how sulfolane discharges are monitored.

Commenters were concerned about the likelihood of an accidental release of airborne toxins. If there is a release, commenters want to know how the airborne pollutants can travel, what human populations would be affected, how local communities would be warned, and who is responsible for managing the impacts of the release. Commenters stated that the surrounding community has suffered from emission leaks and refinery failures in the past, noting the Tesoro Corporation is one of the top 50 toxic air polluters in the U.S., according to data from the federal Toxics Release Inventory assembled by researchers at the University of Massachusetts.

### [Climate change and greenhouse gases](#)

Commenters expressed concern that this project would increase the impacts of climate change. Commenters noted that the project contradicts national and world-wide trends to reduce greenhouse

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<sup>1</sup> Commenters typically referred to mixed xylenes as “xylenes” or “xylene.” This report did not edit this reference when summarizing the comments.

gases (GHGs) and stated that decision makers should consider future generations. Commenters specifically mentioned concerns about the impacts of climate change on the following:

- Agriculture
- Drought
- Forest fires
- Glaciers
- Ocean acidification
- Polar ice
- Public health
- Safety
- Sea level
- Snow pack
- Weather
- Welfare

Commenters requested that the EIS study the direct, indirect, and cumulative impacts of GHG emissions from the following aspects of the project:

- Transportation of xylene, reformate, and other products to the refinery and to Asia and other international destinations
- The operation of the new facilities, specifically the natural gas-fired boiler
- The extraction of raw materials used to create xylene, such as methane released in the fracking process and emissions from heating tar sands

Commenters would like the analysis to present the yearly amount of carbon dioxide emissions from the project and compare it to the current emissions of the region. Commenters asked that the analysis incorporate new information on fugitive emissions of methane and reject the models used in the past. Commenters suggested that the EIS use the social cost of carbon (<https://www3.epa.gov/climatechange/EPAactivities/economics/scc.html>) when assessing the increased GHG equivalent. Commenters would like to know the radius of the carbon emissions and how the jet stream could move the carbon.

Commenters asked that the EIS include a study on what best available control technology can reduce GHG emissions for this project, especially for the new natural gas fired boiler. Commenters would like Tesoro to detail and commit to a plan showing how this project would meet the phased reductions in GHG emissions likely to be required under the Department of Ecology's Clean Air Rule now in development.

Commenters asked if evaporating xylene is considered a GHG.

Commenters suggested that Tesoro be required to mitigate the project's climate impacts by reducing equivalent GHG emissions elsewhere for the life of the project.

### Cumulative impacts

Commenters asked that the EIS consider the full range of cumulative impacts associated with past, present, and proposed crude, coal, and methanol projects in the following locations:

- The project site and vicinity
- Washington
- Oregon
- British Columbia
- Regional waterways
- Skagit County

- Whatcom County

Commenters stated that the analysis should include associated rail transportation and marine operations. Commenters suggested that the EIS consider the cumulative impacts and long-term sustainability of xylene and plastic production.

If the EIS authors are unable to determine what the cumulative impacts of the proposed project are on a particular resource, commenters requested this be clearly stated in the EIS.

### Earth, geology, and soils

Commenters asked that the EIS address the potential hazards from this project associated with onsite geology, soils, erosion, earthquakes, and liquefaction, including those in the shoreline area.

#### *Seismic activity*

Commenters noted that the Northwest is due for a significant earthquake and asked that the EIS address the risk of an earthquake and tsunami, both at the refinery site and along the vessel and rail routes.

Commenters raised concerns that marine vessels traversing the Salish Sea, within the San Juan Islands, and through the Strait of Juan de Fuca would be exposed and vulnerable during an earthquake or tsunami. Commenters would like the EIS to address the vulnerability of vessel and communities along the shores during a seismic event.

Commenters asked that the EIS analyze the likelihood that an earthquake would damage the proposed tanks and other equipment that could spill reformate, mixed xylenes, or other substances onto the ground, into adjacent waters, and emit hazardous vapors into the air. Commenters asked that this analysis describe the direct, indirect, and cumulative impacts from this type of event to the flora and fauna within reasonable vicinity of the Tesoro March Point site. The analysis should consider the strongest earthquake magnitude that is reasonably possible. In addition, commenters requested that the EIS describe effective ways for preventing adverse environmental impacts from damage to the CPUP facilities in the case of an earthquake or tsunami.

Commenters hypothesized that in the event of an earthquake, tsunamis could enter the Puget Sound, Skagit Bay, and Anacortes, washing out roads and railway and cutting off the ability to reach the refinery. Commenters asked that officials be prepared to deal with such a catastrophe.

#### *Geology*

Commenters asked what the geologic conditions are along rail and marine transportation routes. They also asked if the project would lead to more heavy, long trains that could produce more landslides of unstable slopes resulting in loss of life and property. Commenters specifically called out the train tracks in Everett that are frequently closed due to landslides.

#### *Soil*

Commenters asked what impact this project could have on soil and, more specifically, what harmful effects a xylene spill could have on soil. Commenters stated concern that this project would contaminate land and soils.

Commenters asked if construction could release toxic or hazardous materials from disturbance or excavation of contaminated soils or sediments located on the project site.

## Economics

Commenters asked that the EIS describe the positive and negative impacts on jobs, property values, economic growth, and local and state tax revenue. They asked how the project would impact tourism and attracting new residents and business to the area. Commenters stated concern about the economic impacts of the proposed project, noting that it would be a poor economic choice that few would profit from while exposing people and the environment to safety and health risks. Commenters asked if the economic benefits of allowing the production of xylene outweighs the benefits of protecting the unique and productive marine environment that sustains a fishing industry, recreation industry, and quality of life of the citizens of the Pacific Northwest.

Commenters stated that the proposed project would be a money-losing proposition to the U.S. consumer, who would be forced to buy more Chinese-manufactured products, rather than products made in North America. They asked that the EIS study the economic effects of exports and outsourcing jobs, risking already intact communities who bring tax dollars to the area.

Commenters noted that Burlington's retail establishments are a core component of the City's economic prosperity, and any disruptions caused by additional train traffic would be of great concern to the City.

Commenters asked what the economic impact of water consumption and demand would be due to the increased water consumption required by the proposed project.

Other commenters expressed their support for the proposed project stating the potential positive economic impacts, including the following:

- Allowing for restaurants and retailers to hire more employees;
- Diversifying the products that the Tesoro refinery produces, which would in turn help keep the refinery economically viable and competitive;
- Ensuring jobs and tax revenue for the area; and
- Contributing to development in the service sector.

Commenters also stated that the proposed project would stimulate the local economy through construction jobs and new full-time, family wage jobs. Commenters noted that a growing economy requires capital investments and innovative business expansion, which the proposed upgrades would provide for Skagit County. In addition, commenters said that the Tesoro refinery has invested over \$340,000 so far this year in support of charitable organizations in Skagit County.

### *Jobs*

Commenters said the proposed project would have both negative and positive impacts on job creation in the region. Commenters stated that the proposed project would create up to 20 new full-time positions and several hundred temporary construction jobs, with average wages valued at more than twice the Washington state average. Commenters also noted that these new high-paying jobs would generate additional state and local tax revenue, stating that each refinery job creates another job in the community. Commenters noted that this project would also ensure the stability of existing jobs by keeping the refinery competitive and viable.

Other commenters argued that while the refinery provides immediate economic incentives, the jobs provided by expansion are minimal, and most of the profits do not remain in the area, the state, or even the country. Commenters stated that they are concerned this project would potentially export jobs to

Asian refineries. Commenters asked the EIS to specify how many new jobs would be created and the pay level of these new employees.

Commenters said that the economic value of the project to the area described by Tesoro is misleading. They noted that while there would be 12 long-term jobs added by this project, the rest would be high-paying contract jobs hiring individuals from outside the region to move the xylene along the export route. Commenters noted that construction jobs would benefit the area's economy in the short-term, but expressed concern that many people brought in for construction jobs would be imported from other areas, thus negatively impacting the area because the monies made would go elsewhere, not to the local economy or infrastructure.

Commenters worried that temporary workers would drive up prices of housing and put a strain on the rental market, as well as increase the population with industry-dependent individuals. Commenters asked that the EIS study the effects of the proposed project on long-term jobs held by people of the Salish Sea and its surrounding area. Commenters argued that coastal life provides far more long-term jobs than the potential for 12 permanent jobs provided by the proposed project. In addition, commenters argued that employment can be increased through clean energy expansion more than through the perpetuation of fossil fuel consumption.

#### *Spills and accidents*

Commenters stated concern about the economic impacts of a potential spill or accident on site in the Salish Sea and along the transportation routes, and they asked about the economic impacts to the community in the event of a spill, release, or other accident. Commenters worried the proposed project could negatively impact the following:

- Crabbing and shellfish industry
- Fisheries
- Fishing industry
- Marine-based economies
- Native American fisheries
- Natural resource economy
- Tourism

Commenters asked if the economic feasibility to coastal communities' way of life would be compromised in the event of an accident, spill, or release along transportation routes or on site. This includes a request to study how many long-term, local, and current jobs could be permanently lost in the event of a large spill or other catastrophe.

Commenters expressed concern about who would be financially responsible for spill or explosion response and cleanup. Commenters asked that Tesoro be required to post a bond sufficient to cover a worst-case spill or explosion to provide some financial remedy for a disaster and to test whether Tesoro is prepared to absorb the cost of the potential impacts of its proposed project. Commenters also asked that the EIS assess the possibility of requiring Tesoro to obtain insurance sufficient to cover a worst case spill, explosion, or release of toxic fumes. Commenters noted that the insurance industry may think the impacts of an accident are so enormous that it is uninsurable, and the community would be left to absorb the impact. Commenters asked that the EIS include a cost estimate for the cleanup of a major spill, including the health care costs.

### *Environment*

Commenters expressed concern about how the environmental impacts of the proposed project would affect the region's economy. Commenters stated that industrial pollution and global warming are harming the economy and that Anacortes residents want good jobs and a sustainable economy. Commenters questioned if clean businesses would move to Anacortes knowing it is polluted with heightened cancer risks and unlawful industry. Commenters also stated that millions of dollars are being spent annually for restoration projects throughout this marine environment, which could easily be lost to careless handling of dangerous petroleum products.

### *Recreation and tourism*

Commenters cited the 2015 report *Economic Analysis of Outdoor Recreation in Washington State* published by the Washington State Recreation and Conservation Office. The analysis stated that for Skagit and San Juan counties, outdoor recreation accounts for over \$600 million dollars a year of economic activity. Commenters also cited a Skagit Valley Herald report that stated the annual tulip festival brings \$65 million into the county. Commenters asked that the EIS consider the effects of the Tesoro expansion on all segments of the overall economy.

### *Property values*

Commenters asked that the EIS evaluate the effects of the proposed project on property values both near the refinery and along the rail and marine transportation routes. They asked that the EIS study the risk of accidents and spills related to the project and their potential impacts to nearby properties. Commenters noted that this project would deter new businesses and people from moving into the area, which would have a negative effect on property values. Commenters cited pollution, dangerous and dirty jobs, high cancer rate, and unlawful industry as reasons that deter new businesses and residents.

## Energy

Commenters questioned what the best practices are for national energy policy, fossil fuels versus renewable energy, and energy conservation, and asked if the project is consistent with those policies. Commenters wondered if the project would increase the facility's use of energy resources and what are the direct, indirect, and cumulative impacts of that consumption.

Commenters requested that the EIS assess the impacts of extracting fossil fuels for xylene production, including the impacts of fracking for Bakken Oil. Commenters noted that Bakken Oil is higher in xylene and assumed Bakken would be used by Tesoro.

Commenters asked that the EIS clarify the specific types of feedstocks that would be imported and exported from Tesoro's wharf. Commenters would like to know what happens to the non-xylene components of the reformate feedstock, including how they are stored and transported from the refinery.

## Historic and cultural preservation

Commenters noted that the Salish Sea is a treasure and the reason that people live in the area. Commenters asked that the EIS assess the negative impacts on quality of life, attraction of new residents and businesses, and tourism. Commenters stated that Skagit County's reputation as a beautiful farming, fishing, and recreation destination is a major asset, and the expansion of the refinery is not consistent with the County's identity and is a risk to its assets. Commenters asked what impacts this project would

have on nearby residential areas and stated that Fidalgo Bay Aquatic Reserve and Padilla Bay Shoreline of Statewide Significance hold important cultural and historic significance.

Commenters asked what impacts the proposed project would have on archaeological resources and historic buildings.

#### *Tribal rights*

Commenters expressed concern about the security of tribal treaty rights generally and specifically in relation to increased marine vessel and train traffic. Commenters specifically mentioned the Swinomish Tribe but asked that the EIS address impacts to all Native American tribes potentially affected by this proposal. Commenters stated that the EIS should consider the impacts to Tribal Treaty fisheries and fishing activities resulting from the potential increase in vessel traffic and to determine whether there are alternative modes of transportation that do not result in an impact upon Tribal Treaty fisheries or fishing activities. Commenters asked how these possible impacts would affect tribal economies.

Commenters expressed concern that this project may lead to additional trains traveling through the Swinomish Indian Reservation and trespassing on tribal rights, especially in light of the ongoing litigation between BNSF Railway (BNSF) and the Swinomish Tribe.

Commenters asked that special weight be given to the concerns of aboriginal bands, tribes, and communities and asked that decision makers honor their treaty rights as sovereign nations.

Commenters suggested that tribes should have the most weight and influence in determining if this project should go forward or not. Commenters asked that the EIS address what risks to coastal people's economies, way of life, culture, and health may result from this proposal. Commenters asked if Native American populations would be disproportionately affected by breathing fumes, spills, and pollution and asked what protections against this are in place.

#### Land use

Commenters questioned whether the proposed project is consistent with adopted land use plans and zoning, specifically with nearby residential land uses and Padilla Bay National Estuarine and Fidalgo Bay Aquatic reserves. Other commenters argued that the proposed project is a non-conforming use on March Point, citing law that says no noxious use is permitted. Commenters stated that code forbids expansion of non-conforming uses in the Heavy Manufacturing District.

Commenters stated that the refinery is a high-priority violator of federal, state, and local laws, and, as a non-conforming use, it cannot expand in the March Point Heavy Manufacturing District. In addition, commenters stated that both Skagit County and the City of Anacortes have, and are currently, violating citizen's rights by permitting nonconforming uses to expand on March Point (Anacortes Municipal Code; Shoreline Management Act).

#### Noise and vibrations

Commenters requested the EIS address the impacts of noise from construction, long-term plant operations, and transportation to and from the refinery, over the life of the project. Commenters would like the EIS to include a discussion of the impacts and necessary mitigations related to marine vessel noise and asked that the EIS consider the effects of noise pollution associated with the production and transport of these materials.

Commenters raised concerns about negative impacts to humans and animals from project-related noise, these include impacts to:

- Refinery neighbors
- Southern Resident Killer Whales
- Wildlife
- Workers

This includes the impacts of noise at the refinery, as well as noise along the rail and vessel transportation routes.

### Plants and animals

In general, commenters asked that the EIS study the direct, indirect, and cumulative effects of the operation and construction of the project on plants and animals in the following geographic locations:

- Asia
- Canada
- Fidalgo Bay
- International shipping routes
- March Point
- Padilla Bay
- Puget Sound
- Salish Sea
- San Juan Islands
- Strait of Georgia
- Strait of Juan de Fuca
- Vendovi Island

Commenters asked that the EIS analyze impacts on plants and animals from the following events that may be associated with the project:

- Air pollution
- Chemical exposure
- Decrease in food source/supplies
- Displacement
- Disruption of migration routes
- Disturbance
- Emissions
- Explosion
- Fire
- Fragmentation
- Introduction of invasive species
- Light pollution
- Loss of habitat
- Noise
- Ocean acidification
- Propeller strike
- Spills
- Vessel collisions
- Vessel traffic
- Wake strandings
- Water pollution

Specific concerns related to specific types of plants and animals are discussed below.

### *Birds*

Commenters would like to know the direct, indirect, and cumulative effects of emissions, marine vessel traffic, and spills from the project on waterfowl, seabirds, and shorebirds, including the following bird species:

- American White Pelicans
- Bald Eagles
- Brown Pelicans
- Dunlin
- Gray-bellied Brant
- Great Blue Herons (specifically the March Point heronry)
- Hawks
- Marbled Murrelet

Commenters stated that Fidalgo Bay and Padilla Bay are important winter foraging and rearing areas for many species of birds, and that Padilla Bay is designated as an Important Bird Area.

Commenters suggested that the EIS use a community modeling approach similar to the assessment for the proposed Pacific NorthWest LNG project in Port Edward, British Columbia, to examine the cumulative effects of the project on birds. Commenters asked that the EIS study the location of shipping lanes in relation to known marine bird foraging areas in Padilla Bay, the San Juan Islands, elsewhere in the Salish Sea, and along the routes to the destinations of the exported xylene or crude oil. Commenters asked that impacts of the emissions from this project on the West Coast Migratory Flyway be analyzed.

Commenters requested that the EIS address potential changes to marine bird habitat and food supplies. Commenters asked that the analysis examine the impacts to birds of both acute and long-term exposure to petrochemicals and other industrial chemicals such as xylene.

### *Fish and marine invertebrates*

Commenters asked that the EIS examine the impacts from construction and operation of the facility on fish and marine invertebrates, specifically the following:

- Bull trout
- Dungeness crab
- Forage fish
- Oysters
- Pacific herring
- Pacific smelt
- Rock fish
- Salmon
- Sand lance
- Shellfish
- Shrimp
- Steelhead trout

Commenters asked that this analysis include impacts from spills, fire, vessel traffic, and introduction of invasive species; disturbance, displacement, or direct mortality due to collisions, propeller strike or wake strandings; and disruption of migration routes. Commenters stated that the EIS should consider impacts to commercial, recreational, and tribal fishing.

### *Marine Mammals*

Commenters asked that the EIS study the impacts of noise, water pollution, emissions, spills, and increased vessel traffic on marine mammals, specifically the following:

- Blue Whales
- Dahl's Porpoise
- Dolphins
- Fin Whales
- Gray Whales
- Humpback Whales
- Minke Whales
- Northern Pacific Right Whales
- Orcas (including the Southern Resident Killer Whales)
- Sei Whales
- Sperm Whales
- Stellar Sea Lion

Commenters would like the EIS to address how the project may affect marine mammal sonar and navigation. Commenters noted that the Magnuson Amendment should be considered when analyzing impacts to marine mammals.

### *Other species or groups of animals*

Commenters noted concern about the impact of the project to the following additional species or groups of animals:

- Bats
- Leatherback Sea Turtles
- Plankton
- Pollinators
- River Otters

### *Plants*

Commenters asked that the EIS analyze the impacts to vegetation from fire, spills, habitat removal, and increased marine vessel operations including introduction of invasive species, disturbance, displacement, or direct mortality due to collisions, propeller strikes, or wake strandings.

Commenters would like the EIS to study the impacts to eel grasses in Padilla Bay and Fidalgo Bay. Commenters noted the eel grass is an important habitat for many marine creatures and that Padilla Bay is one of the largest expanses of eel grass on the west coast.

### **Plastics and polyester**

Commenters were concerned about the global and environmental impact of the use of exported xylene, specifically when used to create plastics and polyester. Commenters questioned whether Skagit County and the U.S. should support industries that create more plastic products because of the impact plastic has already had on the environment. Commenters stated that xylene would only be used to create products that are not beneficial and suggest that other renewable sources, like hemp, could produce similar products with less environmental impact.

Commenters asked that the EIS consider the amount of pollution already caused by plastic materials and the permanency of them in oceans and landfills. Commenters stated that these materials persist in the environment and are not readily degraded or processed by natural biological mechanisms. Commenters asked what the full lifecycle of the new products would be, and what direct, indirect, and cumulative impacts the public should expect from the products. They state that plastic pollution in the ocean has been widely reported (e.g., <http://time.com/4020046/birds-plastic-ingestion/>) and asked what portion

of the exported xylene would end up in the ocean. Commenters stated that the environmental review should include such estimates. Commenters noted plastics in the ocean are broken up into small particles that have been found suspended in seawater, ingested by small sea creatures, and may concentrate persistent organic pollutants present in the seas.

Commenters cited *Increased Plastic Production*, a Greenpeace report; *Plastic Debris in the World's Oceans*; and the United Nations Environment Programme report, *Marine Litter, An Analytical Overview*.

Commenters were also concerned about the effects of polyester fibers on marine animals, noting that fibers from polyester clothing are being found in fish in Puget Sound and that 25 percent of Chinook salmon have polyester fibers in their stomachs according to an October 16, 2015, Seattle Times article.

### Public health

Commenters asked the EIS to study the health impacts of the proposed project on those living near the refinery and along the transportation routes, refinery workers, and global populations. Specifically, commenters requested a Health Impact Assessment be done for this project that reports on the epidemiology data for communities near a chemical facility compared with communities far away from one. Commenters asked that the EIS address and review all probable and significant global implications of the project including the public health implications of exporting crude oil and the project's contribution to climate change.

Commenters asked that the scope of the EIS include studies of potential acute and chronic human health effects from exposure to air toxics, particulates, and contaminated water due to normal operations and/or accidental releases, spills of crude oil or xylene from or near the facility over the life of the facility, and spills during transportation of crude oil and/or xylene to or from the facility.

Commenters stated they are concerned, based on Tesoro's record as a top polluter and previous lethal explosions at the refinery, that Tesoro would not adequately address pollution and safety. Commenters asked what ongoing, over the life of the project, process safety management approach Tesoro would commit to use to reduce safety risks to its refinery employees, to the public, and to the environment to the *as low as reasonably practicable* standard for the operation of this project.

Commenters stated that a no action alternative should be considered because the proposed project cannot be complete or implemented in a manner that does not gravely endanger human health.

Commenters asked that the EIS explain what the County, consultants, and project proponents see as their public health, safety, and welfare responsibilities in relation to this project.

Commenters noted that three cancers (melanoma, bladder, and prostate) have higher incident rates for residents of the zip code 98211 than the rest of the state's population. Commenters stated that no public health agency will lend resources to combatting these cancers.

### Xylene

Commenters stated concern about xylene specifically and asked what levels of additional toxicity would be present in the environment from the xylenes. Commenters noted that xylene is a substance listed by the federal Agency for Toxic Substances and Disease Registry as having several known and suspected health risks to humans. They state that exposure to xylene has resulted in a range of serious effects to animals.

Commenters asked how exposure to xylene impacts breathing, memory, and response to visual stimulus. They also asked what rate of exposure to xylene causes adverse health impacts. Commenters noted that though xylene is most likely to enter a body when a person breathes its vapors, xylene exposure for humans or wildlife can also occur through ingestion or contact with the eyes or skin. Commenters stated that when inhaled, xylene is rapidly absorbed by your lungs, and a body will retain 50 to 75 percent of the chemical after an exhale. They also said that if ingested, the chemical is rapidly and completely absorbed by the gut.

Commenters cited the Agency for Toxic Substances and Disease Registry, which said that xylene can dissolve into the skin's natural oils and can easily penetrate clothing or get trapped in gloves or boots, where it can cause burns and blisters. Commenters said that xylene passes into the bloodstream quickly after entering the body but generally leaves the body within 18 hours after exposure. Commenters asked that the EIS study the endocrine and hormone disruptors in xylene.

Commenters stated that if any of the operations resulted in a spill, xylene could pose significant risks to the residents of nearby Anacortes. Commenters said that emissions of xylene could contribute to air pollution and illness. Commenters asked that the EIS describe the short- and long-term health impacts of exposure to xylene. Other commenters specified that short-term exposure to xylene is known to cause difficulty breathing, impaired memory, and delayed response to visual stimulus, among other issues.

Commenters included that people have died from short-term exposure to very high levels of xylene. They also noted that long-term exposure can lead to depression, insomnia, tremors, and more. Commenters cited an article in the Journal of Occupational and Environmental Medicine that reported symptoms like anxiety, forgetfulness, and inability to concentrate resulted from regular exposure after many years. Commenters concluded that short- and long-term exposure to higher concentrations of xylene can impact the nervous system, causing headaches, reduced muscle coordination and balance, and confusion.

Commenters raised concern about the less understood health impacts of xylene to animals, which include complications for the kidneys, heart, and nervous system, all of which have been identified in high-level, short-term exposure in animals. Commenters mentioned that animals also lost hearing, had muscle spasms, showed changes in enzyme activity and organ weights, and experienced skin inflammations, according to federal toxicologists.

Commenters cited federal government researchers who have acknowledged that pregnant mothers exposed to xylene may pass the chemical's effects along to the fetus, as studies on animals have shown that xylene absorbed by a mother can cross the placental barrier. This also includes unborn animals impacted by xylene exposure that may have reduced body weight and delayed bone mineralization, as well as problems with motor skills and orientation to their environment after birth.

Commenters cited an April 2015 study published by researchers at the University of Colorado and The Endocrine Disruption Exchange that found that xylene was among the culprits causing hormone disruption even at levels currently deemed "safe" by federal regulators during regular indoor air exposure.

Commenters asked about the toxicity of xylene and chemicals mixed with xylene, including sulfolane and benzene.

Commenters raised concern about the toxicity of benzene, which they said is highly carcinogenic. Commenters said that according to the Tesoro's Material Safety Data Sheet for reformat, the benzene content is 3 to 5 percent and that the Occupational Safety and Health Administration exposure limit is one half parts per million over 8 hours. Therefore, the benzene content of reformat is 60,000 to 100,000 times the safe exposure limit.

Commenters noted that it has been reported in national media that many states have tightened restrictions on xylene because ingesting it impairs the central nervous system (see <https://www.cdph.ca.gov/programs/hesis/Documents/Xylene.pdf>).

#### *Leaks and spills*

Commenters expressed concerns about how a leak or spill of xylene would affect public health, and specifically how a spill or leak would affect first responders. Commenters asked what types of health risks a first responder would be exposed to and how these health impacts would be mitigated. Commenters noted that the cleanup of xylene could pose a health risk, as the substance can form a layer of noxious gas and requires responders to use self-contained breathing apparatus or risk suffocation. Commenters asked if the potential for human health impacts would reduce the speed with which a spill response could be conducted. Commenters also asked that capabilities for emergency response from the industry, government, and community be assessed.

Commenters asked that the EIS include a study on the health impacts of the project on the surrounding community and specifically outline the following:

- Worst case scenario leaks and spill
- Risks and possible outcomes in the case of leaks or spills
- Potential for explosion or fire spreading, factoring the direction and strength of winds in such events
- Who or what would be at risk

They also asked that the EIS include mental health concerns of people affected by a spill, specifically asking the EIS to address stress levels on people who are impacted by spills.

#### *Air pollution*

Commenters asked that the EIS address the impacts from air emissions, dust, and odors from facility operations and along transportation routes, including possible health effects from the release of air toxins and photochemical reactions producing ozone and other air pollutants. Commenters asked what human populations might be affected by airborne pollutants. They also asked about the impacts from air emissions, dust, and odors from facility operations, including possible health effects from the release of air toxins.

Commenters asked that the EIS study potential human health effects of by-products from the MVEC treatment of displaced marine vessel vapors, both on refinery workers and nearby community residents. Commenters also asked if there would be large off-gassings, and how would the public know and protect itself.

An assessment of how existing air emissions from the refinery affect human health was also requested by commenters.

### Project design

Commenters asked that the EIS describe the Purpose and Need for the project. Commenters stated that the CPUP name is misleading since the majority of the costs go toward producing and exporting xylene. Commenters stated support for decreasing the sulfur content in gasoline to meet new federal gasoline standards. Commenters noted that the EIS should explain where the “feeder stock” and xylene would be transported. Commenters asked if additional raw materials would be required to create the xylene and that the EIS address how these materials would be transported.

Commenters asked the EIS to describe how the project would increase demands on public utilities (water, sewer, electricity) during normal plant operations. Commenters asked if additional infrastructure would be needed to support the enhanced facility and how that infrastructure would be funded.

Commenters would like to know the refinery’s capacity for exporting mixed xylenes, subject to limits of output, from the refinery.

Commenters stated that the EIS should discuss the proposed automatic detection systems, isolation mechanisms, and shutdown systems for potential accidental release of liquid and vapor from offloading barges and land storage. Commenters requested the EIS detail the operation and safety of the equipment, including the position of valves, transducers, thermos coupler, and flowmeters; the loading, unloading, and venting procedures; the software verification; the instrumentation; and the inspection of the welds. The EIS should also ensure that these elements are properly reviewed and inspected.

Commenters would like the EIS to show how this project does not violate the spirit and letter of the Magnuson Act, which prohibits expansions at Washington refineries that may increase the amount of oil they handle.

### *Alternatives*

Commenters noted that instead of investing in fossil fuels, projects should invest in renewable clean energy sources such as solar and wind energy. Commenters asked that the EIS consider less toxic substances that could be used to replace xylene. Commenters stated that hemp, plant-based resins, or recycled plastics could be alternatives to producing xylene-based plastics. Commenters mentioned that the EIS should include alternative sites, transportation routes, and courses of action. Commenters pointed out that the sulfur-reducing components of the project could be permitted separately from the xylene exporting components as an alternative to the current project. Commenters declared that a no action alternative should be considered if the project cannot be completed and implemented in a manner that does not endanger both human health and the environment.

### *Marine Vessel Emission Control (MVEC)*

Commenters requested that the EIS study the direct, indirect, and cumulative effects of emissions from the MVEC system and VCU on the nearby flora and fauna of the March Point heronry, Padilla Bay National Estuarine Research Reserve, and Fidalgo Bay Aquatic Reserve. Commenters requested that the EIS explain the MVEC emissions due to displaced marine vessel vapors and assist gas, as well as the total emissions. Commenters also asked if the MVEC system would capture all emissions at the dock. Commenters requested an analysis of the potential human health effects of by-products from the MVEC

system on refinery workers and nearby residents. Commenters wanted to know what the standards are for displaced marine vessel vapors and assist gas and how they are monitored.

Commenters were concerned about the production of carbon dioxide from the VCU associated with the MVEC.

Commenters asked if it is possible for the MVEC to be used in the process of preparing vessels to load other cargo, including crude oil, and if the MVEC system changes the volume of crude oil the Tesoro facility can process.

#### *Naphtha Hydrotreater Unit (NHT)*

Commenters noted that a previous NHT ruptured in 2010 killing seven Tesoro employees and questioning the safety of the NHT expansion. Commenters requested that the EIS detail the steps that Tesoro would take to ensure effective process safety management to reduce the risk from operation of the expanded NHT unit. Commenters asked if Tesoro is complying with the U.S. Chemical Safety and Hazard Investigation Board's safety recommendations regarding the NHT. Commenters would like to know how Tesoro would ensure that leaks, cracks, and other equipment faults at the NHT would not become regarded as "accepted and normalized" conditions over the life of the project.

#### *Storage Tanks*

Commenters requested that the EIS identify the xylene storage tank emission rates and toxic air pollutant emissions. Commenters inquired about the standards for xylene tank emission and how these emissions are monitored.

#### *Vessels*

Commenters requested that the EIS specify the types, size, and holding capacity of the marine vessels that would be used to transport xylene, reformate, and constituent products. Commenters questioned if the vessels would be double-hulled barges or tankers with tug escorts. Commenters asked how often these vessels would take on bunkers and where that activity would occur.

Commenters noted that the EIS should detail the routes and destination of the vessels. Commenters requested that the EIS study the impacts from exhaust emissions from marine vessels underway, anchored, or moored at the loading dock. Commenters would like to know if the vessels could import invasive marine species on the tanker hulls. Commenters asked if there would be provisions for the discharge of waste from the vessels. Commenters stated that the EIS should explain what would be done with the gasses evacuated from the vessels being loaded with xylene and what happens to the tankers that bring reformate to Tesoro.

#### *Potential for Exporting Crude and Other Materials*

Commenters asked that the EIS address the potential for crude oil and other materials to be exported or transported from Tesoro's marine terminal once the MVEC system is in place. Commenters were concerned that this facility could be adapted into a crude export facility without undergoing a full environmental review, especially since the ban on exporting crude has been lifted. Commenters requested that the EIS consider the effects of crude export unless the EIS and permitting clearly outlines that Tesoro cannot use this facility for crude export.

## Recreation and tourism

Commenters stated that the region is dependent on income from tourism, recreation, farming, retirement facilities, and fishing. Commenters requested that the EIS consider the adverse economic impacts to these industries that could be caused by increased vessel traffic, toxic emissions, or spills.

Specifically, commenters requested that the EIS consider impacts to the following:

- Boating
- Cycling
- Fishing and crabbing
- Parks
- Swinomish casino and hotel
- Trails
- Tulip festival
- Wildlife viewing

Commenters identified the following geographies as being potentially affected:

- Fidalgo Bay
- Padilla Bay
- Salish Sea
- San Juan Islands
- Swinomish Reservation

## Safety

Commenters requested the EIS fully document how the project may potentially impact public safety and all potential impacts from construction, operation, a spill or accident. They also asked that the EIS evaluate the safety impacts of other chemicals involved in the production of mixed xylene, and that it consider security and terrorism concerns.

Commenters expressed concern about Tesoro's safety record and asked that the EIS evaluate safety requirements, accountability, and emergency preparedness. Other commenters noted that Tesoro is committed to safety and did not express concern over safety records. They also requested that valve location and closure be examined to ensure they are correct and safe.

Commenters also asked the EIS to evaluate safety impacts associated with increased vessel and barge traffic and safety impacts to Native American tribes.

### *Spills*

Commenters requested the EIS conduct a comprehensive evaluation of the likelihood and potential impacts of a xylene or other substance spill. They also asked how an earthquake could impact the risk of a spill at the facility. Commenters expressed concern that xylene may be difficult to contain and could flow into ground water, rivers, and streams. They requested that the EIS evaluate the health impacts of any potential spills. Commenters also asked how the impacts from any spills may adversely impact Native American tribes, and how they might affect coastal communities' way of life. They also asked what systems would be in place to prevent a large spill should a leak occur.

Commenters requested that the EIS evaluate the potential impacts of a xylene spill into marine waters including the human and environmental impacts. They expressed concern that xylene is colorless, spreads quickly, and is difficult to contain. They asked that the EIS address how additional vessel traffic would impact the likelihood of spills.

Commenters requested that the EIS evaluate direct, indirect, and cumulative impacts on several bodies of water, including the following:

- Fidalgo Bay Aquatic Reserve
- Padilla Bay National Estuarine Research Reserve
- Puget Sound
- Salish Sea
- San Juan Island archipelago

Commenters also asked about the impacts of spills on wildlife such as the following::

- Dungeness crabs
- Dunlin
- Great blue herons
- Grey-bellied brant
- Marbled murrelet
- Orca whales
- Salmon
- Waterfowl, seabirds, shorebirds

Commenters suggested that mitigation measures could include providing oil spill bird rescue and response training and coordination, as well as establishing a funding mechanism to provide for oil spill cleanup expenditures on land and water. Commenters specified that impacts of a xylene or crude oil spill would be beyond mitigation.

#### *Fires*

Commenters asked about the flash point and volatility of xylene and the risk of fire along rail and marine transportation routes, including security and terrorism concerns. They also asked if there are other chemicals used in the production of mixed xylene and if these chemicals are flammable.

Commenters asked what dangers large-scale forest fires pose to the Project and how the xylene Project could increase the dangers should there be a fire. They also requested that the EIS address potential impacts of a fire on the environment, including fish, wildlife, vegetation, and threatened and endangered species. They also requested that the EIS outline the potential for fire spreading, considering the direction and strength of wind in such events, and identify who or what would be at risk.

Commenters asked if emergency plans and response capability are adequate to respond to a large fire at the project site or vessel loading area. They also suggested that Tesoro be required to have plans in place to control a fire, should it occur, and that financial responsibility for fire management and cleanup should be assigned. They also expressed concern about Tesoro's safety record and a previous history of refinery fires.

#### *Explosions*

Commenters expressed concern that xylene is more volatile and increases the risk for explosion and asked that the EIS evaluate the risk of explosion along rail and marine transportation routes as well as at the project site. They also requested an analysis of security and terrorism concerns related to potential explosions and asked if a xylene explosion would set off a chain reaction causing gasoline tanks to explode. They asked what would happen to Fidalgo Island if an explosion were to cut off the Swinomish Bridge and requested that the EIS address how explosions would be prevented.

Commenters requested that the EIS evaluate the impacts of an explosion on communities, the environment, water, and public health, and identify who or what would be at risk should an explosion occur. Commenters asked if emergency plans and response capability are adequate to respond to a catastrophic explosion at the project site or vessel loading area.

Commenters noted that Tesoro should be required to post a bond and carry insurance sufficient to cover the impacts of an explosion. They asked that the EIS determine financial burden and accountability in the event of an explosion.

#### *Worker safety*

Commenters requested that the EIS address what ongoing process safety management approach Tesoro would use to reduce safety risk to employees. They expressed concern about health impacts for workers regularly exposed to xylene, including mental health impacts and impacts from the MVEC system. They also asked what Tesoro would do to protect workers from long- and short-term impacts of xylene and other chemical exposure. They also asked if spill responders would be exposed to health risks, how these health impacts would be mitigated, and what the risk of injury due to accidents and spills is to responders.

Commenters asked the EIS to evaluate the emergency response training level of full time employees and contract workers. They also suggested that staff should have a contractual right to stop operations if they perceive unsafe conditions and union protection if they exercise this right.

Commenters expressed concern about Tesoro's safety record and the history of refinery worker deaths, specifically in 2010. Commenters asked if all the findings in the investigation following the 2010 accident were adequately addressed. They asked what the safety requirements are for the NHT to avoid any additional loss of life. They also noted concern about the potential for unjust labor practices.

#### *Emergency Response*

Commenters requested that the EIS evaluate if public agencies are organized and staffed sufficiently to respond to an accident. They asked about the existing emergency plans and the ability of local emergency response agencies and plant operators to implement those plans. They also requested the EIS evaluate if Skagit County has a detailed spill response plan in the case of an oil spill.

Commenters asked what is necessary to respond to a spill and what additional spill response equipment would be purchased to respond to a spill. They also noted the EIS should evaluate the capacity to respond to both spills on land and at sea.

They asked how the facility would increase demands on public services such as police, fire, and emergency medical services, and what it would cost to fund an adequate emergency response system. Commenters also requested the EIS examine how Tesoro intends to warn people of a leak or accident.

Commenters expressed concern that emergency responders may be exposed to health risks and asked how health impacts would be mitigated. They also asked if the potential for human health impacts reduces the speed with which a spill could be addressed.

#### *Inspection and enforcement*

Commenters expressed concern over compliance with safety and environmental regulations. They asked that the EIS address what government agencies would be charged with technical oversight and how Tesoro would ensure the facility does not violate the Clean Air, Clean Water, and Endangered Species acts.

Commenters noted that Tesoro has had violations of state workplace, safety, and health regulations in the past and asked how Tesoro would ensure it does not violate additional regulations. The NHT was of

particular concern, as commenters requested that the EIS explain how it would remain in compliance with the U.S. Chemical Safety and Hazard Investigation Board's safety recommendations.

#### *Rail safety*

Commenters are concerned that the number of trains carrying crude would increase with the proposed project. Commenters stated that increasing the amount of crude oil brought in to the region concerns them for many reasons, including but not limited to: rail track integrity, increased possibility of spills on land and water, difficulties of spill response, and public health concerns.

Commenters asked that the EIS address safety impacts from crude by rail in the following areas:

- Anacortes
- Fidalgo Bay
- Missoula, Montana
- Padilla Bay
- Salish Sea
- Skagit County
- Skagit River
- Spokane, Washington
- Swinomish reservation
- Transit lines from the source

Commenters asked if Skagit County conducts extensive track inspection of the rails bringing crude oil into the county and if Skagit County has a detailed spill response plan in case of a derailment of a crude oil train on land. Commenters asked who would be responsible in the case of a crude by rail train derailment, explosion, or spill. Commenters asked 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).

Commenters expressed concern about the state of rail infrastructure and that oil sloshing in the cars may exacerbate the problem and cause higher than expected track failures. Commenters stated that crude oil cars are so heavy it has been determined that they are splitting the rails. Commenters noted that the infrastructures of rails and bridges are weak and in need of major repair before being used to transport oil and chemicals. Commenters asked that rail infrastructure be improved before adding additional oil trains.

Commenters were specifically concerned about the safety of tank cars used to transport crude oil. Commenters argued that new rail cars are not proven to be safer for the transport of tar sands oil, as evidenced by two explosions of trains in the last two years that were transporting this type of crude oil using new tank cars. Commenters asked that the EIS study the level of puncture resistance of the tank cars and at to what speed the tank cars are puncture proof.

#### **Transportation**

Commenters noted that this proposal has the potential to increase various modes of traffic, including vehicular, rail, and marine vessel. Commenters would like all potential economic impacts resulting from traffic congestion, delay, and/or intermittent closures of rail crossings to be documented. They requested that the analysis quantify traffic and travel delay times and associated economic impacts under all possible transportation scenarios. Commenters would like the analysis to be broken down by jurisdiction so that each city can see how it would be impacted.

Commenters worry that investment in expanded infrastructure for exporting fossil fuel products would increase the traffic of such products through the Northwest, which commenters are concerned would increase risk to communities and support the continued use of fossil fuels.

Commenters stated that the transport of oil poses significant human and environmental hazards.

#### *Vehicular traffic*

Commenters asked what impacts there would be to vehicular traffic from plant construction, including waste and by-products transported to and from the site. Also, commenters asked what the impacts to vehicular traffic from plant operation would be, including the potential road shipment of mixed xylenes.

#### *Marine vessel traffic*

Commenters would like the EIS to describe the impacts from increased marine vessel traffic to the following areas:

- Columbia River
- Fidalgo Bay
- Guemes Channel
- Padilla Bay
- Salish Sea
- Samish Island
- San Juan Islands
- Shipping route to Asia
- Turn Point
- Rosario Strait
- Strait of Juan de Fuca

Commenters would like to know how much the proposed project would increase existing vessel traffic. They asked how many vessels currently traverse the Salish Sea each week and how many vessels (tankers and barges) the Tesoro refinery receives, currently, per week. Commenters asked if the number of vessels (tankers and barges) per week would increase due to the production of xylene and, if so, by how much. Commenters would like to know if Tesoro would increase the number of vessels transporting crude to and from the refinery each week/month immediately or over time. Commenters also asked how the changes in vessel traffic would impact the Salish Sea, including the impacts of increased noxious liquid substances. In addition, commenters asked if the marine vessels would be required to have tug escorts and, if so, along what part of the waterway.

Commenters requested that if the project is issued a permit, it should expressly limit the number of marine vessels to and from Tesoro to the five marine vessel transits per month described in the SEPA materials.

Commenters expressed concern about vessels in the area traversing a difficult area to navigate, especially at turn points. Commenters cited that the *Vessel Traffic Risk Assessment 2010 Final Report*,<sup>2</sup> which states that the waterway zone that poses the greatest oil spill risk is Guemes Channel, followed closely by Rosario Strait. Combined, these waterway zones, adjacent to the proposed project area, represented over 30 percent of the total oil spill risk. Commenters also cited a study done by the Friends of the San Juan Islands on increases in tanker traffic, and they have estimated that with increased tanker traffic, there is a 375 percent increase in the chance of a serious marine vessel accident off Turn Point, which is one of the trickiest navigational spots in the San Juan Islands.

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<sup>2</sup> Van Dorp, J. R., and J. Merrick. 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. 166 p.

Commenters said they are concerned that the increased tanker traffic would have a detrimental effect on the local economy, growth, and value of living in this area. Commenters stated that the potential impacts of increased vessel traffic on the environment, including but not limited to marine waters, shorelines, wildlife, and nearby properties, could have potential impacts on the local economy reliant on these resources. Specifically, commenters stated that vessel traffic impacts could affect marine trades and boat tourism.

Commenters stated that the potential impacts of increased vessel traffic are compounded by the impending subduction earthquake and the tsunami it would release.

Commenters expressed concern about the potential for shipping crude oil from the proposed xylene export terminal. They specifically noted concern about shipping oil to Tesoro's Kenai refinery at Nikiski, Alaska, and to the proposed Tesoro offloading terminal in Vancouver, Washington. Commenters requested that the EIS include consideration of the potential for crude oil export from Tesoro's marine terminal upgrade.

Commenters noted that the Section 7 ESA Consultation No-effect Letter (assessment prepared on behalf of the U.S. Army Corps of Engineers) does not address the delivery via marine vessel of the supplemental feedstocks required for the proposed xylene production, the proposed export of xylene via marine vessel to Asian markets, and the potential adverse impacts to protected species should a spill of these products occur. The application provides no analysis of the marine vessel traffic related risks of a xylene and/or xylene feedstocks spill and no associated analyses related to the Natural Resource Damage Assessment Process.

Commenters asked that the EIS consider the cumulative impacts of the additional vessel traffic throughout the waterway with reasonably expected vessel traffic increases from other proposals. This includes an examination of the safety risks of the proposed project in addition to marine traffic from other large industrial terminals and related projects planned or the Salish Sea in both the U.S. and Canada.

Commenters requested that the EIS study the cumulative impacts of marine vessels going through Puget Sound and the Salish Sea and all the way to Canada and to Asia. They stated the study should include the risk of spills of xylene and crude oil or other emissions from fuels that carry the loads. Commenters requested a study of marine vessel impacts on air quality and water quality, as well as the effects on the flora and fauna of marine waters.

Commenters asked that the EIS address the proposed project's potential conflict with the Magnuson Amendment which, they state, has effectively kept supertankers, those bigger than 125,000 tons, out of Puget Sound.

Commenters asked that the EIS study the potential offsite impacts on fish, wildlife, vegetation, wetlands, and 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. See Chapter 6, Plants and Animals, for additional discussion on this topic.

Commenters asked that the project proponents conduct a vessel traffic risk assessment to study the increased risk of ship collisions, spills, and groundings. Commenters requested that the EIS analyze the emergency response capability as a result of increased vessel traffic.

Commenters request that the EIS study the impacts of the increased oil vessel traffic in the Salish Sea, including the impacts from exhaust emissions from marine vessels underway, anchored, or moored at the loading dock.

Commenters asked that the EIS consider the impacts to Tribal Treaty fisheries and fishing activities resulting from the full range of potential additional vessel traffic and to determine whether there are alternative modes of transportation that do not result in an impact upon Tribal Treaty fisheries or fishing activities.

#### *Rail traffic*

Commenters asked if the increase in vessel traffic would cause a related increase in rail traffic and stated their concern about the potential for increased rail traffic to and from the Tesoro refinery. If the project increases rail traffic, commenters would like the EIS to study rail impacts beyond the Anacortes rail subdivision, including the following areas:

- Bozeman, Montana
- Burlington, Washington
- Coastal regions
- Columbia Basin
- Columbia River
- Major rail corridors in Washington State
- Seattle, Washington
- Skagit County
- Spokane, Washington
- Vancouver, Washington
- Whatcom County

Commenters asked how many oil trains traverse Skagit County each week and how many oil trains the Tesoro refinery receives per week. Commenters would like to know if the number of oil trains per week would increase due to the production of xylene. They also asked if Tesoro would increase rail traffic immediately or over time, and by how much. Commenters asked if the proposal limits Tesoro to the volume of crude oil received or if the refinery is allowed to import more crude oil than this project specifies. Commenters asked if any of the ingredient components would be transported by rail and where these products would be transported from.

Commenters stated concerns about the potential offsite impacts from rail traffic 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.

Commenters asked that the EIS examine the impacts from exhaust emissions from diesel-electric locomotives and asked that the EIS study the air pollution from rail traffic. Commenters noted that heavy oil trains require multiple engines, increasing the noxious diesel exhaust with the respiratory health effects noted by the Washington Physicians for Social Responsibility. Commenters suggested the EIS study the cumulative impacts of the proposal and associated transportation emissions on the regional air quality in the context of current conditions and proposed increases in facility emissions, as well as those from increased rail and vessel traffic.

Commenters asked that the EIS study the cumulative impacts of increased rail traffic with consideration of all proposed projects and existing facilities in the region. This includes asking for the total combined oil train traffic entering Tesoro and Shell, should Shell's Crude by Rail Project be approved. Commenters asked that the EIS address the cumulative impacts of all the oil trains on all of the communities between the source and the refinery.

Commenters stated that they are concerned about the potential impacts increased rail traffic could have on emergency response. They asked 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, or other accidents that result in catastrophic oil spills, explosions, or fires along offsite rail transportation routes. Commenters asked what the impacts would be from increased traffic delays and delays on emergency vehicles at railroad crossings and increased risk of derailments and accidents.

Commenters asked how increased train traffic would interfere with the movement and circulation of people and goods. Specifically, commenters noted that Burlington's retail core is of key importance to the city's economic prosperity and would be negatively affected by vehicular delays caused by additional train traffic.

Commenters noted that an easement agreement between the Swinomish Indian Tribal Community, BNSF, and the U.S., limits the use of the rail line easement crossing the Swinomish Reservation to one train of no more than 25 cars per day. Commenters stated that the EIS should evaluate whether this project assumes utilization of more than one train of no more than 25 cars per day for transportation to or from the applicant's facility and, if so, examine whether there are alternative modes of transportation that do not rely upon overburdening the easement.

Commenters stated that although Tesoro's refining capacity may remain the same, CPUP could increase the facility's ability to transfer oil from trains to marine vessels and requested that the EIS address this possibility. Commenters stated that they are concerned Tesoro would use the facility to export crude in addition to xylene, thus increasing oil-train traffic to the refinery and asked that this increase to rail traffic be added to the scope of the EIS.

Commenters stated they are concerned about the risks from increased oil train traffic, including risks of derailment, explosion, spills, pollution of train exhaust, and increased rail traffic accidents.

### Visuals

Commenters stated that the existing refinery is not visually appealing and asked what the aesthetic impacts of the new facility would be on existing views/vistas. In addition, commenters expressed concern about the visual impact of increased trains operating in Skagit County and asked what those visual impacts may be. Commenters noted that the Fidalgo Aquatic Reserve and Padilla Bay Shoreline are of Statewide Significance and provide an important habitat that needs protection for aesthetic reasons.

### Water resources

Commenters expressed concern that the project may impact water quality in the area. They asked that the EIS evaluate all potential impacts to water from construction and operations.

Commenters asked if the National Pollutant Discharge Elimination System permit for the facility can be modified to consider the additions of the proposed project and would this permit be subject to the Tier II anti-degradation process outlined in the Clean Water Act to ensure water quality is not degraded any further than at current uses.

#### *Drinking water*

Commenters expressed concern that xylene may spill in the project area and could potentially contaminate groundwater. They commented that xylene spilled onto soil has the potential to travel into drinking water sources, where it can remain for several months.

#### *Groundwater*

Commenters requested that the EIS analyze the potential impacts of xylene spills or releases into groundwater sources. They also expressed concern that xylene may remain in groundwater for months without breaking down and could lead to public health impacts. Commenters asked that the EIS describe how groundwater contamination would be addressed, should there be a spill.

#### *Rivers*

Commenters expressed concern over the potential impacts of xylene or crude oil spills into rivers and asked that the EIS examine these impacts. They noted the Skagit River and Columbia River as particularly significant rivers to be analyzed, among other bodies of water.

#### *Marine waters*

Commenters noted that the increase in vessel traffic would impact the natural environment as well as shoreline communities. Commenters expressed concern that xylene and crude oil may spill into saltwater areas during construction and operation. They asked that the EIS analyze the potential impacts of such a spill, including the impacts on plants and animals, fishing, tourism, properties, and the environment. They also asked that the EIS evaluate the general impacts of increased vessel traffic in saltwater areas. Commenters noted the following saltwater areas of particular concern:

- Fidalgo Bay
- Pacific Ocean
- Padilla Bay
- Puget Sound
- Salish Sea
- Strait of Georgia
- Strait of Juan de Fuca

#### *Wetlands*

Commenters requested that the EIS analyze the potential impacts of facility operations and of xylene on nearby wetlands, including impacts to vegetation and wildlife. The Fidalgo Bay Aquatic Reserve and Padilla Bay National Estuarine Research Reserve were of particular concern. Commenters also expressed concern that wetland habitat may be removed by the project, and that exotic plants or animals may be introduced.

### **Permitting and EIS process**

Commenters asked that SEPA documents be clear about whether or not the proposal expands the refinery's operations and product output.

Commenters asked that the EIS include the same scoping issues that were included in the EIS for the Tesoro Savage Vancouver Energy Project.

Commenters asked that the agencies consider permitting some portions of the facility upgrades and not others. Commenters asked if any portion of this project is contingent on the environmental review of the Shell crude by rail facility.

Commenters stated that this project should qualify for National Environmental Policy Act review.

Commenters noted that some laws of the City of Anacortes may prohibit the expansion of the facility. Commenters stated that by issuing expansion permits to well-documented noxious, hazardous “High Priority Violator” refineries, Skagit County, and the City of Anacortes are violating the Washington State SEPA.

Commenters asked that the EIS include official opinions of the Washougal School District; the Columbia Gorge Commission; the Columbia River Inter-Tribal Fish Commission; the cities of Spokane, Spokane Valley, Bingen, Portland, Vancouver, Seattle, Edmonds, and Mount Vernon; and the Washington State Council of Fire Fighters.

Commenters asked that the scoping period be extended so that communities in all the nearby areas have time to learn, comment, and participate in the decision making process.

Commenters requested that all EIS studies be completed by non-affiliated, non-industry academic and scientific sources that are trusted in the fields of both human and environmental health. Commenters pointed to potential conflicts of interest from authors of other petroleum industry EIS documents.

Commenters stated that the EIS should consider possible impacts from any mitigation needed for this project.

## Appendix A: Determination of Significance

### DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT FOR TESORO CLEAN PRODUCTS UPGRADE PROJECT

**Description of proposal:** Tesoro Refining & Marketing Company LLC's (Tesoro) proposes infrastructure additions and upgrades to its existing facility in Anacortes, Washington in order to produce 15,000 barrels per day of mixed xylenes and to supply cleaner local transportation fuels. The refinery is located in western Skagit County on March Point, along the southwestern edge of Padilla Bay.

Elements of the proposed project's infrastructure include installing a Marine Vapor Emissions Control (MVEC) System, a Vapor Combustion Unit (VCU) and an Isomerization Unit; building an Aromatics Recovery Unity (ARU), a new steam boiler and storage tanks; and expansion of the existing Naphtha Hydrotreater to process 46,000 barrels of naphtha per day. A brief description of elements follows:

- Building a Marine Vapor Emissions Control (MVEC) system that would control marine vessel emissions from existing refinery vessel operations and from the new xylene transport, including:
  - Dock Safety Units (DSU) on the wharf structure to receive vapors controlled by the MVEC system
  - A new natural gas line from the refinery to the DSU
  - A Vapor Combustion Unit (VCU) near the existing Wastewater Treatment Plant
- Constructing an Aromatics Recovery Unit (ARU) which can produce mixed xylenes
- Installing a steam boiler
- Adding an Isomerization Unit to process light hydrocarbons and increase the amount of octane available to the refinery
- Expanding the existing Naphtha Hydrotreater, increasing hydrotreating capacity by about 15% (46,000 barrels per day) in order to further reduce the sulfur content in gasoline
- Installing three storage tanks next to the existing tankage area, expanding the tank storage area to the west

The project is known as the Tesoro Clean Products Upgrade (CPU) Project. The proposed project is not dependent on any particular mode of crude transportation. Production and shipment of xylenes are projected to increase ship traffic at the Tesoro wharf by up to five vessels per month. The proposed project does not increase Tesoro's refining capacity.

**Proponent:** Tesoro Refining & Marketing Company LLC (Tesoro)

**Location of proposal:** The Tesoro Anacortes Refinery is located at 10200 West March Point Road, Anacortes, WA 98221 in western Skagit County on March Point.

The project area is located on Parcels P32990 and P32989 within the South ½ of Section 21, Section 28 and the East ½ of Section 29, all in Township 35 North, Range 2 East, W.M.

**Lead Agency:** Skagit County Planning and Development Services

**EIS Required.** The lead agency has determined this proposal may have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.031 and will

be prepared in accordance with RCW 43.21.C.030(2)(c),(d), and (e). Areas for potential discussion in the EIS include, but are not limited to:

- Earth
  - Geology
  - Soils
  - Topography
  - Unique physical features
- Air
  - Air quality
  - Odor
  - Greenhouse gas/Climate
- Water
  - Surface water movement/quantity/quality
  - Runoff/absorption
  - Floods
  - Groundwater movement/quantity/quality
  - Public water supplies
- Plants and animals
  - Habitat for and numbers or diversity of species of plants, fish or other wildlife
  - Unique species
  - Fish or wildlife migration routes
- Environmental health
  - Noise
  - Risk of explosion
  - Releases or potential releases to the environment affecting public health such as toxic or hazardous materials
- Land and shoreline use
  - Relationship to existing land use plans and to estimated population
  - Light and glare
  - Aesthetics
  - Historic and cultural preservation
- Transportation
  - Vehicular traffic
  - Waterborne, rail, and air traffic
  - Parking
  - Movement/circulation of people or goods
  - Traffic hazards
- Public services and utilities
  - Fire
  - Police
  - Schools
  - Parks or other recreational facilities
  - Water/stormwater
  - Other governmental services or utilities

**Scoping.** Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS within a 29-day expanded comment period beginning on March 17, 2016 and closing on April 15, 2016.

Comments in the following areas are particularly valuable:

- Reasonable range of alternatives
- Potentially affected resources and extent of analysis for those resources
- Measures to avoid, minimize, and mitigate effects of the proposal

During the entire scoping period project information and comment opportunities can be accessed via the online open house <http://TesoroAnacortesEIS.PublicMeeting.info>. In addition, one scoping meeting will be held in the location listed and will include an open house

- Anacortes: Thursday, March 31 • Anacortes High School gym and Brodniak Hall, 1600 20th St., 4-8 pm.

Written scoping comments will be accepted at the scoping meeting.

There will be a facilitated verbal comment session from 4:30-7:00 pm at the public scoping meeting.

During the scoping comment period you may also submit comments by:

- Submitting electronic comments via the online open house:  
<http://TesoroAnacortesEIS.PublicMeeting.info> between March 17, 2016 and April 15, 2016
- Calling and recording a message at 1-877-685-7356 (toll free) *5 minute time limit for messages*
- Sending electronic written comments to: [comment@TesoroAnacortesEIS.com](mailto:comment@TesoroAnacortesEIS.com)
- Hand deliver to Skagit County Planning & Development Services, 1800 Continental Place, Mount Vernon, WA during regular business hours by April 15, 2016
- Mailing your comments to:  
Tesoro CPUP EIS, PO Box 21069, Seattle, WA 98111  
*Must be postmarked by April 15, 2016*

**Documents available:** An environmental checklist and other information can be viewed online at <http://www.skagitcounty.net/Departments/PlanningAndPermit/tesoroclean.htm>, or reviewed at Skagit County Planning & Development Services, 1800 Continental Place, Mount Vernon, WA 98273.

**Responsible official:**

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

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## Appendix B: Scoping notifications

The following tools were used to announce the release of the DS and start of the scoping period:

### Project email

Email sent to 128 addresses provided by Skagit County from stakeholders involved in previous phases, key stakeholders identified by the County.



## Tesoro Anacortes Clean Products Upgrade Project (CPUP)

### ENVIRONMENTAL IMPACT STATEMENT

### Help identify the scope of study!

Skagit County issued a Determination of Significance on March 17, 2016, and is now overseeing the [preparation of an environmental impact statement](#) (EIS) for a project proposed by the Tesoro Anacortes Refinery. An EIS must be prepared when the lead agency determines a proposal is likely to have significant adverse environmental impacts.

The first step in the development of an EIS is called scoping. During the scoping phase, Skagit County is seeking comments on what should be studied in the EIS. Scoping will help Skagit County define the extent of the studies and analysis. The [scoping comment period](#) starts today and continues through April 15, 2016.

### What is Tesoro proposing?

Tesoro proposes additions and upgrades to its existing facility in order to produce 15,000 barrels per day of mixed xylenes and to supply cleaner local transportation fuels. Mixed xylene is a compound found in gasoline, and is used to make clothing, plastics and other synthetic products. The proposal includes:

- Building a **Marine Vapor Emissions Control system** to capture vapors from marine vessels that come to the dock. The emission control unit will involve a small unit on the dock, a new natural gas line along the dock and a small unit on the shore.
- Constructing an **Aromatics Recovery Unit**, a unit that produces mixed xylenes
- Adding an **Isomerization Unit**, which will make additional light hydrocarbons and increase the amount of octane available to the refinery
- Expanding the **Naphtha Hydrotreater** to remove more sulfur compounds from gasoline
- Installing a **steam boiler** to provide additional energy to operate the new units
- Installing three **storage tanks** next to the existing tank storage area

### We would like to hear from you!

The public will play an essential role in the Tesoro Anacortes CPUP EIS process. There are several ways to learn more about the project and provide comments during scoping.

**Visit the online open house, March 17 - April 15, 2016**

[TesoroAnacortesEIS.publicmeeting.info](http://TesoroAnacortesEIS.publicmeeting.info)

**Attend the scoping meeting on Thursday, March 31**

- Location: Anacortes High School gym and Brodniak Hall, 1600 20th St., Anacortes, WA 98221
- An open house with information about the proposed project: **4-8 pm**
- Facilitated verbal comment session: **4:30-7 pm\***
- Comment forms and other options will be available to provide your comments

*\*We will have a lottery system to determine speakers, unless there is adequate time to accommodate all those who wish to speak.*

## **Other opportunities to submit your comments during the scoping phase**

- **Call** and record a message at 1-877-685-7356 (toll free)  
*5-minute time limit for messages*
- Send an **Email** to [comment@TesoroAnacortesEIS.com](mailto:comment@TesoroAnacortesEIS.com)
- **Mail** your comment to Tesoro CPUP EIS, PO Box 21069, Seattle, WA 98111  
*Must be postmarked by April 15, 2016*
- **Hand Deliver** your comments to Skagit County Planning and Development Services, 1800 Continental Pl, Mount Vernon, WA 98273 by 4:30 pm on April 15, 2016

## Advertisements

Print and online ads placed in local papers (over 60,000 estimated impressions).

Media Outlet	Geographic Area	Readership	Advertisements
Skagit Valley Herald	Skagit and Island Counties	31,492	1 display ad run
Anacortes American	Anacortes	7,631	1 display ad run
San Juan Journal	San Juan Island	1,393	1 display ad run
GoSkagit.com	Skagit County	n/a	20,000 online impressions



**Tesoro Anacortes Clean Products Upgrade Project**  
ENVIRONMENTAL IMPACT STATEMENT

**VISIT THE ONLINE OPEN HOUSE**  
TesoroAnacortesEIS.PublicMeeting.info  
Open March 17 – April 15, 2016

**ATTEND THE SCOPING MEETING**  
Thursday, March 31, 4:00 – 8:00 p.m.  
Anacortes High School, 1600 20th St.



**Tesoro Anacortes Clean Products Upgrade Project**  
ENVIRONMENTAL IMPACT STATEMENT

Skagit County issued a Determination of Significance on March 17, 2016, and is now overseeing the preparation of an environmental impact statement (EIS) for a project proposed by the Tesoro Anacortes Refinery. Tesoro is proposing additions and upgrades to their existing facility in order to produce 15,000 barrels per day of mixed xylenes and to supply cleaner local transportation fuels.

**Opportunities to learn about the proposed project**

**Visit the online open house**  
TesoroAnacortesEIS.PublicMeeting.info  
Open March 17 – April 15, 2016

**Attend the scoping meeting**  
Thursday, March 31  
Anacortes High School, 1600 20th St.  
Open house:  
4:00 – 8:00 p.m.  
Verbal public comment session:  
4:30 – 7:00 p.m.

**We would like to hear from you!**

The EIS scoping phase is now underway. You can learn about the proposed project at the web address provided to the left. Submit your comments for the scoping phase through April 15, 2016.

Phone: 877-685-7356  
Mail: PO Box 21069, Seattle, WA 98111  
Email: comment@TesoroAnacortesEIS.com  
Hand deliver: Skagit County Planning and Development Services, 1800 Continental Pl., Mount Vernon, WA 98273



**Tesoro Anacortes Clean Products Upgrade Project**  
ENVIRONMENTAL IMPACT STATEMENT

**VISIT THE ONLINE OPEN HOUSE**  
TesoroAnacortesEIS.PublicMeeting.info  
Open March 17 – April 15, 2016

**ATTEND THE SCOPING MEETING**  
Thursday, March 31, 4:00 – 8:00 p.m.  
Anacortes High School, 1600 20th St.



**Tesoro Anacortes  
Clean Products Upgrade Project  
ENVIRONMENTAL IMPACT STATEMENT**

**Opportunities to learn about the  
proposed project and comment**

**VISIT THE ONLINE OPEN HOUSE**

TesoroAnacortesEIS.PublicMeeting.info  
Open March 17 – April 15, 2016

**ATTEND THE SCOPING MEETING**

Thursday, March 31, 2016  
Anacortes High School, 1600 20th St.  
Open house: 4:00 – 8:00 p.m.  
Verbal comment session: 4:30 – 7:00 p.m.

**CLICK TO LEARN MORE ►**

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## Appendix C: Tribes and Governments

The following is a list of tribes and government organizations who submitted comments during the scoping period.

### Tribes

Swinomish Indian Tribal Community

### Federal

None

### State

None

### Local

City of Burlington