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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Becky Hardey
La Conner, 98257

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Becky Hardey, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
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5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: James Hipp
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, James Hipp, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Andronetta Douglass
Bellingham, 98226-8174

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Andronetta Douglass, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Daviann McClurg
Larned, 67550

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Daviann McClurg, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: John Holstein
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, John Holstein, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Robin Craft
Plain City, 43064

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Robin Craft, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

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Date: November 2, 2017

From: Mike Maghakian
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Mike Maghakian, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Elaine Borgias
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Elaine Borgias, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jeanne Poirier
Cashmere, 98815

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jeanne Poirier, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Nancy Orlowski
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Nancy Orlowski, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Dennis Schaeff
Meadville, 16335

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Dennis Schaeff, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jack McBride
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jack McBride, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Ursula Mass
La Conner, 98257-8927

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ursula Mass, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

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Date: November 2, 2017

From: Ruth LeBrun
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ruth LeBrun, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Hannah Moffett
Deming, 98244

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Hannah Moffett, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Barbara Lamb
Langley, 98260

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Barbara Lamb, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Ai McCarthy
Redmond, 98052

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ai McCarthy, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Ursula Mass
La Conner, 98257-8927

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ursula Mass, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kathy Bradley
Lugoff, 29078

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kathy Bradley, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Eric Edwards
West Chicago, 60185

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Eric Edwards, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Cornelia Shearer
Auburn, 98092

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Cornelia Shearer, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Maureen Kelly
Blaine, 98230

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Maureen Kelly, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kelly McConnell
Tigard, 97223

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kelly McConnell, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Shaun Hubbard
Friday Harbor, 98250

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Shaun Hubbard, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Hue Beattie
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Hue Beattie, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Elaine Donovan
Hemlock, 14466

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Elaine Donovan, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jennifer Purcell
Bellingham, 98229-9366

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jennifer Purcell, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Yvonne Dee Stahl
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Yvonne Dee Stahl, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Frances Burleson
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Frances Burleson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Dan Senour
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Dan Senour, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jan Gordon
Bow, 98232

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jan Gordon, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Peter Remick
Mt. Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Peter Remick, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Diane Smith
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Diane Smith, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: David & Valerie Davies
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, David & Valerie Davies, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Barbara Rosenkotter
Deer Harbor, 98243

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Barbara Rosenkotter, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kalisha Phoenix
Seattle, 98105

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kalisha Phoenix, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Loading mixed xylenes
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Liz Washburn
Bellingham, 98225-1002

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Liz Washburn, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: teresa dix
Mount Vernon, 98274

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, teresa dix, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Elsie Wattson Lamb
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Elsie Wattson Lamb, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: LaVera Langeman
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, LaVera Langeman, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Janet Wynne
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Janet Wynne, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Tina McKim
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Tina McKim, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: John Bremer
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, John Bremer, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kathie E Takush
Reading, 19602-1251

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kathie E Takush, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: William Lewis
Aurora, Colorado, 80013

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, William Lewis, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Robert Johnston
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Robert Johnston, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Martha Hammer
Ferndale, 98248

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Martha Hammer, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Cori Bishop
Egg Harbor City, 8215

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Cori Bishop, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: David Scheer
Bellingham, 98225-8280

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, David Scheer, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Suzanne Lewis
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Suzanne Lewis, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Loading mixed xylenes
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jane Bright
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jane Bright, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Tony Moureilles
Cambridge, 2138

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Tony Moureilles, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: kathryn alexandra
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, kathryn alexandra, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Sara Airoidi
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Sara Airoidi, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Wesley Banks
Vancouver, 98682

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Wesley Banks, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Marianne Edain
Langley, 98260

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Marianne Edain, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: David Laws
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, David Laws, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Suzann Finch
Bellingham, 98225-4102

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Suzann Finch, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Thomas Gilmore
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Thomas Gilmore, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Elaine Becker
Roanoke, 24018

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Elaine Becker, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Wendy Bartlett
Bellingham, 98225-5828

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Wendy Bartlett, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Asko Hamalainen
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Asko Hamalainen, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Warren Sheay
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Warren Sheay, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Laurie Gogic
Kirkland, 98034

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Laurie Gogic, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Sean Edmison
Redmond, 98052

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Sean Edmison, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Maureen Cleveland
Deming, 98244

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Maureen Cleveland, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Nichoas Lenchner
Santa Rosa, 95403

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Nichoas Lenchner, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Virgene Link-New
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Virgene Link-New, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Stan Parker
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Stan Parker, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Susan Kane-Ronning
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Susan Kane-Ronning, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Helen McLeod
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Helen McLeod, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Brooks Anderson
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Brooks Anderson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Julia Hurd
Burlington, 98233

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Julia Hurd, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Lise Grace
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Lise Grace, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Codi Hamblin
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Codi Hamblin, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Dena Jensen
Blaine, 98230

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Dena Jensen, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Polly Jones
Bellingham, 98225-2604

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Polly Jones, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Cheryl Harrison
Clear Lake, 98235

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Cheryl Harrison, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Ruth Heft
Mount Vernon, 98274

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ruth Heft, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Holly Harris
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Holly Harris, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Nic Curtright
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Nic Curtright, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Matt B
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Matt B, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Hal Glidden
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Hal Glidden, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Brian O'Dell
Seattle, 98117

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Brian O'Dell, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Joline Bettendorf
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Joline Bettendorf, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Brenda Bailey
Eastsound, 98245

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Brenda Bailey, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Danielle C
Charleston, 29414

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Danielle C, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Lois Christensen
Olga, 98279

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Lois Christensen, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Marg Clumpner
Ferndale, 98248

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Marg Clumpner, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Joe Collier
Blaine, 98230

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Joe Collier, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Susan Hass
Sammamish, 98075-7492

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Susan Hass, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Cynthia Bentley
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Cynthia Bentley, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Karen Burns
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Karen Burns, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Rand Guthrie
Snohomish, 98290

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Rand Guthrie, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Anne Elkins
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Anne Elkins, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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- Loading mixed xylenes
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Anne Richardson
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Anne Richardson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017
From: Bruce Baglien
Anacortes, 98221
To: Skagit County Planning and Development Services
Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Bruce Baglien, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Pam Uri
Blaine, 98230

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Pam Uri, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Tavi Arlev
Blaine, 98230

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Tavi Arlev, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Danny Dyche
Hillsboro, 97123

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Danny Dyche, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Mark Thompson
Seattle, 98117

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Mark Thompson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Terese VanAssche
Bow, 98232

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Terese VanAssche, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Robin Sharan
Port Townsend, 98368

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Robin Sharan, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Joe Wiederhold
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Joe Wiederhold, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kristin Sykes-David
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kristin Sykes-David, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Dr Carolynn Cory
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Dr Carolynn Cory, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017
From: George Keefe
Edmonds, 98020
To: Skagit County Planning and Development Services
Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, George Keefe, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Peer Holcomb
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Peer Holcomb, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Margaret Hashmi
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Margaret Hashmi, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kimberly Leeper
Seattle, 98116

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kimberly Leeper, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: John J. Ferreiro
Bellingham, WA, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, John J. Ferreiro, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Nadine LaVonne
Seattle, 98107

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Nadine LaVonne, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Meryle A. Korn
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Meryle A. Korn, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Dorothy Jordan
Lynden, 98264

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Dorothy Jordan, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Elizabeth Hines
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Elizabeth Hines, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Tom Cloud
Tonasket, 98855

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Tom Cloud, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Allen Snow
Tonasket, 98855

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Allen Snow, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Libby Hazen
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Libby Hazen, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Tracy Ouellette
Bow, 98232

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Tracy Ouellette, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Maxine Clark
Bremerton, 98310

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Maxine Clark, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Amy Mower
Maple Falls, 98266

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Amy Mower, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Renee Majour
Seat, 98117

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Renee Majour, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Rebecca Canright
Rockport, 98283

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Rebecca Canright, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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- Unloading reformat
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Mark Canright
Olympia, 98505

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Mark Canright, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Amy Hansen
Rockport, 98283

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Amy Hansen, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Treva Gabrisch
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Treva Gabrisch, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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5. Greenhouse Gas Pollution Assessment
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Lois Canright
Rockport, 98283

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Lois Canright, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Natalie Van Leekwijck
Hazard, 68844

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Natalie Van Leekwijck, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Liisa Wale
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Liisa Wale, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Amanda Colbert
Burlington, 98233

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Amanda Colbert, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Michele Beven
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Michele Beven, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Dorothy Plaister
Eastsound, 98245

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Dorothy Plaister, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Cindi Lund
Lopez Island, 98261

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Cindi Lund, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Amy Nesler
Friday Harbor, 98250

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Amy Nesler, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kathleen Capson
Blaine, 98230

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kathleen Capson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kelly Eret
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kelly Eret, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Nina hinton
Camano Island, 98282

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Nina hinton, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Alexandra Loeb
Seattle, 98122

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Alexandra Loeb, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Irene Derosier
Mt Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Irene Derosier, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Sonny Meehan
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Sonny Meehan, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Carolyn Gastellum
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Carolyn Gastellum, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Gina Pantier
Federal Way, 98003

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Gina Pantier, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Unloading reformate
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Lynn Colson
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Lynn Colson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Satya Vayu
Portland, 97206

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Satya Vayu, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
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- Loading gasoline blendstock
- Loading crude oil for export

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Nancy Shimeall
Redmond, 98052

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Nancy Shimeall, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Gary Bennett
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Gary Bennett, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jamie K Donaldson
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jamie K Donaldson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Janice Huseby
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Janice Huseby, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Anne Winkes
Conway, 98238

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Anne Winkes, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Liz Marshall
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Liz Marshall, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Linda Gibbs
Blaine, 98230

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Linda Gibbs, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Gary Meader
Everson, 98247

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Gary Meader, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Ron Ward
Freeland, 98249

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ron Ward, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Laura Hanks
Milwaukie, 97222-2325

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Laura Hanks, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Steven Johnson
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Steven Johnson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Mike Sennett
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Mike Sennett, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Sammy Low
Stanwood, 98292

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Sammy Low, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Unloading reformate
- Loading mixed xylenes
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Dr Carolynn Cory
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Dr Carolynn Cory, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Gena DiLabio
Mount Vernon, 98274

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Gena DiLabio, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Teri Jones
Coupeville, 98239

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Teri Jones, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Unloading reformate
- Loading mixed xylenes
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: John Smith
Clearlake, 98235

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, John Smith, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Linda Baker
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Linda Baker, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Erika Bugbee
Mount Vernon, 98274

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Erika Bugbee, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Susan Odium
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Susan Odium, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Roberta Moser
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Roberta Moser, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jerry Williams
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jerry Williams, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Susan and Don Thurn
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Susan and Don Thurn, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: June Jordan
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, June Jordan, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
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5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Trudy Stuart
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Trudy Stuart, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Janet Stein
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Janet Stein, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Barbara Perry
Bellingham, Washington

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Barbara Perry, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Verena Giebels
Bow, 98242

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Verena Giebels, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Colleen Curtis
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Colleen Curtis, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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- Unloading reformat
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jaye Stover
Burlington, 98233

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jaye Stover, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Sarah severn
Friday Harbor, 98250

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Sarah severn, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Phyllis Dolph
Port Townsend, 98368

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Phyllis Dolph, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Sharon Belk-Krebs
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Sharon Belk-Krebs, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Julie Martinson
Everett, WA, 98201-1114

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Julie Martinson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Susan Kirchoff
Seattle, 98199

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Susan Kirchoff, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Ann Nugent
Bellingham, WA, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ann Nugent, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Julia Sutton
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Julia Sutton, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Mary Ratermann
Burlington, 98233

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Mary Ratermann, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: James Asa
Burlington, 98233

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, James Asa, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017
From: Kathy Vermeeren
Bellingham, 98229
To: Skagit County Planning and Development Services
Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kathy Vermeeren, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
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5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Laurie Sherman
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Laurie Sherman, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
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5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kari Sherman
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kari Sherman, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Karlee Deatherage
Bellingham, WA

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Karlee Deatherage, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Hannah Coughlin
La Conner, 98257

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Hannah Coughlin, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Zackary Tyler
La Conner, 98257

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Zackary Tyler, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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2. Vessel Traffic Spill Risk and Marine Impacts
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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Fran McDade
La Conner, 98257

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Fran McDade, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Scott McDade
La Conner, 98257

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Scott McDade, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Cliff McDade
La Conner, 98257

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Cliff McDade, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Andrew Eddy
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Andrew Eddy, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Julia Spencer
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Julia Spencer, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformate
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Andrea Reiter
Bellingham, 98229

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Andrea Reiter, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Susan Woods
Sedro Woolley, 98284

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Susan Woods, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Marjorie Leone
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Marjorie Leone, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kate McMullen
Seattle, 98116

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kate McMullen, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Andrew Eckels
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Andrew Eckels, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
2. Vessel Traffic Spill Risk and Marine Impacts
3. Air Quality Impacts
4. Water Quality Impacts
5. Greenhouse Gas Pollution Assessment
6. Process Safety Management for Prevention of Accidents

A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

- Unloading reformat
- Loading mixed xylenes
- Loading gasoline blendstock
- Loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Michael Penuelas
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Michael Penuelas, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Aaron Mandell
Seattle, 98103

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Aaron Mandell, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Ryan Morrison
Glacier, 98244

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Ryan Morrison, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Annie Honrath
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Annie Honrath, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Mark Johnson
Lummi Nation, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Mark Johnson, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Galen Herz
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Galen Herz, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Lindsey Gard
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Lindsey Gard, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Lynn Rabenstein
Burlington, 98233

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Lynn Rabenstein, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Diana Rempe
White Salmon, 98651

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Diana Rempe, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Janet Weedman
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Janet Weedman, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Bailey Cheney
Seattle, 98105

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Bailey Cheney, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Glenda Alm
Mount Vernon, 98273

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Glenda Alm, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Krag Unsoeld
Olympia, 98502

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Krag Unsoeld, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Isabel Juell
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Isabel Juell, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Amy Mower
Maple Falls, 98266

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Amy Mower, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Deborah Romerein
Portland, 97212

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Deborah Romerein, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I support the objections detailed in comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper Alliance, Protect Skagit, Washington Environmental Council, Sierra Club, The Lands Council, and Physicians for Social Responsibility.

Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected. Thank you for your consideration of my comment.

Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Todd Davison
Tumwater, 98512

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Todd Davison, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

1. Lack of Alternatives
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A Shoreline Conditional Use Permit should also be required for new and existing overwater structures at the marine terminal which Tesoro plans to use for:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Gwen Hunter
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Gwen Hunter, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Julie Whitacre
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Julie Whitacre, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Carl Wassilie
Vashon, 98070

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Carl Wassilie, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Amber Train
Bellingham, 98226

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Amber Train, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Kara Whittaker
Burien, 98146

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Kara Whittaker, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Jessie Pemble
Bellingham, 98225

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Jessie Pemble, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Carl Ullman
Anacortes, 98221

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Carl Ullman, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: John Day
Sedro Woolley, 98284

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, John Day, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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Skagit County:

Deny Tesoro's xylene permit

Date: November 2, 2017

From: Martha Bray
Sedro Woolley, 98284

To: Skagit County Planning and Development Services

Re: Tesoro Anacortes Refinery CPUP Shoreline Permit

Comments: **Please withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) until the shortfalls in the EIS are corrected.**

I, Martha Bray, urge you to withhold the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). Before a permit decision is made, substantial flaws in The Environmental Impact Statement (EIS) must be corrected, relating to:

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November 1, 2017

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Richard Johnson

6 Overlake Court

Bellingham, WA 98229

jazzpacnw@yahoo.com

November 1, 2017

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Debby Jackson

PO Box 13091

Vashon, WA 98070

debby.jackson@centurytel.net

November 1, 2017

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Lynn Colson

4740 Austin court

Bellingham, WA 98229

lmmcemail@yahoo.com

November 1, 2017

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JP Kemmick

1029 NE 91st st

Seattle, WA 98115

jpkeemmick@gmail.com

November 1, 2017

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Virgene Link-New

PO Box 543

Anacortes, WA 98221

linkerwan@yahoo.com

November 1, 2017

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Thank you for accepting and considering these comments.

Michael Betz

2630 Franklin

Bellingham, WA 98225

mwbetz@comcast.net

November 1, 2017

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Lasha Wells

6243 3rd ave south

Saint Petersburg, FL 33707

cocobuddr@hotmail.com

November 1, 2017

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Vicky Gannon

2125 1st Avenue, #2701

Seattle, WA 98121

gannonvicky@yahoo.com

November 1, 2017

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Dirk Vermeeren

912 queen street

Bellingham, WA 98226

seattle.expresso@gmail.com

November 1, 2017

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Dorothy Downes

PO 306

LaConner, WA 98257

bedrock1@wavecable.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Don Robertson

3105 30th Ave SE

Puyallup, WA 98374

robedon60@gmail.com

November 1, 2017

Producing and exporting xylenes from the west coast

Dear Skagit County Planning and Development Services,

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Bonnie Rohrer

4416 Landmark Dr

Mount Vernon, WA 98274

bonrohr@me.com

November 1, 2017

Environment

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Gina Pantier

37632 26th Dr S

Federal Way, WA 98003

gsvesey@excite.com

November 1, 2017

Tesoro

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Cheryl Lawrence

348 High St

Freeland, WA 98249

cheryllawrence@mac.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Mark Wirth

101 Boylston Ave. E. #35

Seattle, WA 98102

mark.purple@gmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Joan Miller

5402 34th Ave SW

Seattle, WA 98126

jenskink@yahoo.com

November 1, 2017

Tesoro permit

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Virgene Link-New

PO Box 543

Anacortes, WA 98221

linkerwan@yahoo.com

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Nancy Carey

1541 NW Harvey Ave

Roseburg, OR 97471

carebee2001@gmail.com

November 1, 2017

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Robert Lyle

30452 10th Avenue South

Federal Way, WA 98003

roblyle@comcast.net

November 1, 2017

ATTN: OSMRE, John Henry EA

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shary B

1950 Alaskan Way #126

Seattle, WA 98101

shary50@yahoo.com

November 1, 2017

No xylene

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Leslie Ross

321 NW 42nd St.

Seattle, WA 98107

leslieross321@gmail.com

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Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Erin Kilpatrick

3914 S Angeline ST

Seattle, WA 98118

el_kilpatrick@yahoo.com

November 1, 2017

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Jared Howe

4107 Martin Luther King Junior Way South

Seattle, WA 98108

jaredchowe@gmail.com

November 1, 2017

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Inge Dalland

16020 9th Ave SW

Seattle, WA 98166

idalland@msn.com

November 1, 2017

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Shirley Hoh

703 35th Street

Anacortes, WA 98221

shoh@comcast.net

November 1, 2017

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Claudia Eberly

21815 38th Dr SE

Bothell, WA 98021

pceberly@comcast.net

November 1, 2017

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Grace Stiller

13257 5th Ave SW

Burien, WA 98146

grace2u@isomedia.com

November 1, 2017

Too many toxins in our world

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Ed Louchard

521 Snagstead Way

Port Townsend, WA 98368

edlouchard@gmail.com

November 1, 2017

There's no full recovery from a big spill - look at the Valdez many years later..... re: Tesoro Anacortes Refinery CPUP Shoreline Permit

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Madeline Crowley

920 29th Ave

Seattle, WA 98122

madrigalena@mac.com

November 1, 2017

Clean Energy Now!

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Mary Fleck

4511 50th Ave SW

Seattle, WA 98116

maryfleckws@gmail.com

November 1, 2017

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Thomas Swoffer

32607 SE 341 St

Ravensdale, WA 98051

swofftr@q.com

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Amy Hansen

11589 Martin Rd

Rockport, WA 98283

pittle.r.us@gmail.com

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Rebecca Canright

11589 Martin Rd

Rockport, WA 98283

rebeccagroovypeace@gmail.com

November 1, 2017

CPUP NEEDS AND EIS PRIOR TO APPROVAL

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Rob Rowe

2010 SE 140th Ave

Vancouver, WA 98683

chekfaxxcorp@comcast.net

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Clayton Smith

817A 13th Ave

Seattle, WA 98122

claytn8@gmail.com

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Bette Ann Schwede

6192 Oakview Pl

Ferndale, WA 98248

betteschwede@yahoo.com

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Philip Power

821 dock st

Tacoma, WA 98402

bluesailor87@gmail.com

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Morgan Kiley

79 Jenny Lind Drive

Harpers Ferry, WV 25425

mkiley1990@hotmail.com

November 1, 2017

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Richard Johnson

6 Overlake Court

Bellingham, WA 98229

jazzpacnw@yahoo.com

November 1, 2017

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Thank you for accepting and considering these comments.

Richard Johnson

6 Overlake Court

Bellingham, WA 98229

jazzpacnw@yahoo.com

November 1, 2017

CPUP

Dear Skagit County Planning and Development Services,

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Lillian Bay

2782 Irenella

Camano island, WA 98282

baylilybay@gmail.com

November 1, 2017

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Rocky Votolato

20715 Larch Way

Lynnwood, WA 98036

rocky@rockyvotolato.com

November 1, 2017

Crude oil and chemical exports through Anacortes.

Dear Skagit County Planning and Development Services,

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Jack Stansfield

16314 62nd Avenue NW

Stanwood, WA 98292

jstansfield8981@gmail.com

November 1, 2017

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Carla Keel

18228 Capet Zalsiluce Rd

La Connner, WA 98257

keel44@gmail.com

November 1, 2017

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Brenda Bailey

PO Box 656

Eastbound, WA 98245

salim3796@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery Clean Products Upgrade Project

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lynne ashton

p o box 138

indianola, WA 98342

lynnewashton@gmail.com

November 1, 2017

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Laura Hanks

6281 SE Deering Ct.

Milwaukie, OR 97222

laura.hanks@comcast.net

November 1, 2017

Stop crude oil and chemical exports through Anacortes.

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Jonathan Boyne

Kakela Dr.

Honolulu, HI 96822

boyne@hawaii.edu

November 1, 2017

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Robert Briggs

837 SE Edge Knoll Dr

Pullman, WA 99163

rsb@turbonet.com

November 1, 2017

STOP TOXIC PLANS

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Margaret Ness

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Seattle, WA 98103

margaret.mbn@gmail.com

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Phil Brooke

PO Box 294

Wilkeson, WA 98396

oldbrickhousefarm@yahoo.com

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Susan Kane-Ronning

3015 Silvern Lane

Bellingham, WA 98226

oceanpeak@comcast.net

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Joanna Crocker

7301 NE 175 St

Kenmore, WA 98028

jcrocker@lava.net

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George Keefe

960 5th Ave S

Edmonds, WA 98020

georgehank@gmail.com

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Scott Bishop

1710 Giles NW

Olympia, WA 98502

sbishop@oly-wa.us

November 1, 2017

Stop Tesoro CPUP

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Nolen Scott

3606 Woodland Park Ave N, APT 410

Seattle, WA 98103

nolenscott@gmail.com

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Dan Mosby

13846 Avon Allen Road

Mount Vernon, WA 98273

kpeterson781@yahoo.com

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Thank you for accepting and considering these comments.

Ursula Mass

15797 Snee-Oosh Rd

La Conner, WA 98257

urmmas919@gmail.com

November 1, 2017

Stop crude oil and chemical exports through Anacortes

Dear Skagit County Planning and Development Services,

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Danielle C

1573 Ashley Garden Blvd.

Charleston, SC 29414

strangecathedral@outlook.com

November 1, 2017

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Susan Hass

19524 SE 24th Place

Sammamish, WA 98075

Hass@ibiblio.org

November 1, 2017

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Kathie Takush

785 Grange Road

Leesport, PA 19533

ktakush@yahoo.com

November 1, 2017

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Robert Triggs

Box 261

Port Townsend, WA 98368

littlestoneflyfisher@mail.com

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Clayton Jones

4246 S 148th St

Seattle, WA 98168

seajay21649@gmail.com

November 1, 2017

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Gregory Penchoen

1202 Auburn Way S

Auburn, WA 98002

gapenchoen@yahoo.com

November 1, 2017

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Eleanor Dowson

2007 Millpointe Drive SE

Bothell, WA 98012

eleanordowson@comcast.net

November 1, 2017

tesoro anacortes refinery cpup

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jan gordon

16544 Colony Road

Bow, WA 98232

janimals1@yahoo.com

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trout222@abhost.us

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Sandra Smith

329 17th Ave

Seattle, WA 98122

7schipperkes@gmail.com

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Michelle LeSourd

6854 18th Ave NE

Seattle, WA 98115

meishel62@hotmail.com

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katy mcfadden

313 SW Maricara St

Portland, OR 97219

katytmcfadden@gmail.com

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Dr. Matt Smitherman

7031 28th Ave NE

Seattle, WA 98115

msmither1@gmail.com

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Sharon Wilson

3240 NE 96th St

Seattle, WA 98115

thuja8@comcast.net

November 1, 2017

Please re-evaluate Tesoro Anacortes Clean Products Upgrade Project's EIS

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Robert Kaminski

7607 Orchard Ave.

Snohomish, WA 98290

robert.kaminski91@gmail.com

November 1, 2017

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james hipp

609 Rosette Ct

Bellingham, WA 98226

jrhipp010@gmail.com

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Jen Smoose

711 2nd Ave N

Seattle, WA 98109

jennifer.smoose@gmail.com

November 1, 2017

Tesoro Anacortes Refinery Clean Products Upgrade

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Thank you for accepting and considering these comments.

Jeanne Kleyn

PO Box 756

La Conner, WA 98257

jeanne@jkleyn.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Emily Boliver

52 Moores Circle

Laurel, MS 39443

senilenurse@yahoo.com

November 1, 2017

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Laura Tucker

615 Sheridan

Port Townsend, WA 98368

ltucker@berkeley.edu

November 1, 2017

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Nan McMurry

3156 Laurel Road

Longview, WA 98632

nanmcmurry@yahoo.com

November 1, 2017

Further Evaluation of Risks Needed Re: Tesoro Anacortes Refinery Clean Products Upgrade Project

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Kimberly Leeper

3936 SW 97th St

Seattle, WA 98116

kimberly@growyouroasis.com

November 1, 2017

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Joe Wiederhold

1405 Edwards St

Bellingham, WA 98229

jwiederhold47@gmail.com

November 1, 2017

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Lorraine Johnson

4858 S Kenny St

Seattle, WA 98118

lorraine.d.johnson@gmail.com

November 1, 2017

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Sue Moon

1300 Lake Washington Boulevard S

Seattle, WA 98144

sueamoon@gmail.com

November 1, 2017

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fred karlson

5779 vista dr

Ferndale, WA 98248

fkarlson@frontier.com

November 1, 2017

Please re-evaluate Tesoro Anacortes EIS

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Robert Kaminski

7607 Orchard Ave.

Snohomish, WA 98290

robert.kaminski91@gmail.com

November 1, 2017

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tom borst

60857 State Route 20

Marblemount, WA 98267

theupriverrat@gmail.com

November 1, 2017

Tesoro Anacortes Refinery -- Xylenes

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Roberta Adams

PO Box 12833

Olympia, WA 98508

rlawa@comcast.net

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Lynn Colson

4740 Austin court

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lmmcemail@yahoo.com

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Emma Johnson

4831 Columbia Dr S

Seattle, WA 98108

emmajohnson@w-link.net

November 1, 2017

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Shannon Markley

PO Box 31382

Seattle, WA 98103

markley.shannon@yahoo.com

November 1, 2017

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Jason Hughes

1107 San Juan Dr.

Camano, WA 98282

electrojunk@mac.com

November 1, 2017

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JP Kemmick

1029 NE 91st st

Seattle, WA 98115

jpkeemmick@gmail.com

November 1, 2017

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Thank you for accepting and considering these comments.

JP Kemmick

1029 NE 91st st

Seattle, WA 98115

jpkeemmick@gmail.com

November 1, 2017

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elyette weinstein

5000 Orvas Ct. SE

Olympia, WA 98501

elyette_w@yahoo.com

November 1, 2017

Stop Crude oil exports through Anacortes

Dear Skagit County Planning and Development Services,

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Susan Wilkie

8611 Zircon Drive SW

Lakewood, WA 98498

chris1986@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Jared Howe

4107 Martin Luther King Junior Way South

Seattle, WA 98108

jaredchowe@gmail.com

November 1, 2017

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WEndy Mullen

1472 Nw Woodbine way

SEattle, WA 98177

wem@gmail.com

November 1, 2017

Tesoro

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Teresa Nelson

2204 1/2 N 45th St

Seattle, WA 98103

tmnelson2001@yahoo.com

November 1, 2017

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Ai McCarthy

15807 NE 49th St.

Redmond, WA 98052

aym73@hotmail.com

November 1, 2017

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Jill Janow

18708 Robinwood Rd. SW

Vashon, WA 98070

jilljanow@gmail.com

November 1, 2017

oil

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Rep. Seth Armstrong, retired

2552 14th Avenue West #401

Seattle, WA 98119

setharmstrong2004@yahoo.com

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Curtis Cawley

3630 22nd Ave W #307

Seattle, WA 98199

cawley_21@hotmail.com

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Mark Canright

11589 Martin Rd

Rockport, WA 98283

rchorse11@aol.com

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Shoreline Substantial Development Permit - Tesoro Anacortes Refinery CPUP

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Jane Steadman

6756 10th Ave NW

Seattle, WA 98117

janesteadman@gmail.com

November 1, 2017

Protect the Salish Sea

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Gordon NACCARATO

714 Market ST #202

Tacoma, WA 98402

gnaccarato@aim.com

November 1, 2017

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Marsha Adams

2201 SE Maple Valley Hwy #82

Renton, WA 98057

adams_marsha@fastmail.fm

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Robert Kaminski

7607 Orchard Ave.

Snohomish, WA 98290

robert.kaminski91@gmail.com

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Leslee Jaquette

71-158th PI SE

Bellevue, WA 98008

lesleejaquette3@gmail.com

November 1, 2017

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Cathy Sampson-Kruse

11303 Zier Rd

Yakima, WA 98908

ulla1855@gmail.com

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Ravinder Bajwa

6910 Old Redmond Road

Redmond, WA 98052

bajwa679@yahoo.co.ul

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Thank you for accepting and considering these comments.

Hannah Coughlin

18130 Raleigh Lane

La Conner, WA 98257

hannahc@re-sources.org

November 1, 2017

No Xylenes in Anacortes

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Rae Levine

710 Lake Washington Blvd. S

Seattle, WA 98144

rlevine@igc.org

November 1, 2017

Xylene "a toxic, volatile, flammable petrochemical in our waters...NOT!

Dear Skagit County Planning and Development Services,

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Patrick Annabel

818 E Chestnut St

Walla Walla, WA 99362

parzival1@inbox.com

November 1, 2017

Environmental protection

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Nancy White

13311 E Forrest Ave

Spokane, WA 99216

nancypendletonwhite@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Esther Faber

2716 Williams

Bellingham, WA 98225

bellinghamesther@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Teresa Allen

6184 North Fork Rd

Deming, WA 98244

allenterri@comcast.net

November 1, 2017

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Lasha Wells

6243 3rd ave south

Saint Petersburg, FL 33707

cocobuddr@hotmail.com

November 1, 2017

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6243 3rd ave south

Saint Petersburg, FL 33707

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November 1, 2017

XYLENE PRODUCTION AND OIL TRAINS

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J DEROSIA

3057 IVERSON LANE

CUSTER, WA 98240

tusnowbirds@juno.com

November 1, 2017

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George Fuller

4624 SW 333rd Ct

Federal Way, WA 98023

george-fuller@att.net

November 1, 2017

Protect the Salish Sea

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Katherine Giseburt

647 W Lake Sammamish Pkwy NE

Bellevue, WA 98008

katiemgiseburt@gmail.com

November 1, 2017

CPUP

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Robin Hernandez

3107 59th Ave NE

TACOMA, WA 98422

robinh3107@comcast.net

November 1, 2017

Concerns About CPUP

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Devon Peterka

311 NE 162nd St

Shoreline, WA 98155

devonpeterka@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Natalie Van Leekwijck

444 Munn Street

Hazard, NE 68844

hoepagirl@gmail.com

November 1, 2017

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Christina Scheuer

7703 22nd Ave NW

Seattle, WA 98117

cscheuer@gmail.com

November 1, 2017

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Lila Trowbridge

349 n 75th st

Seattle, WA 98103

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November 1, 2017

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Mary Pinckert

5115 115th st se

everett, WA 98208

mbpinckert@aol.com

November 1, 2017

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Sean Den Adel

8105 Sierra Dr

Edmonds, WA 98026

sean.denadel@gmail.com

November 1, 2017

Tesoro refinery modificationis

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dan Senour

809 37th st

Anacortes, WA 98221

1dsenour@gmail.com

November 1, 2017

Stop Tesoro

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Karen Flood

1973 Coyote Ln

Bellingham, WA 98226

karenmac9371@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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julia lakey

17312 100 on Lane SW

Vashon, WA 98070

jlakey@centurytel.net

November 1, 2017

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Lois Canright

11589 Martin Rd

Rockport, WA 98283

rebeccanrig@gmail.com

November 1, 2017

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Pam Borso

PO Box 154

Custer, WA 98240

borsope@aol.com

November 1, 2017

Oil and chemical exports

Dear Skagit County Planning and Development Services,

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Nadine LaVonne

2031 NW 59th St Apt 303

Seattle, WA 98107

nlavonne@comcast.net

November 1, 2017

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Thank you for accepting and considering these comments.

David Hermanns

9442 N Tioga Ave

Portland, OR 97203

dhermann@earthlink.net

November 1, 2017

Please protect our local waters, nothing is more important to my family

Dear Skagit County Planning and Development Services,

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Kiki Rose

407 Charles Rd

Port Angeles, WA 98363

djkikidp@msn.com

November 1, 2017

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Barbara Stevenson

23851 SE 98th PL

Issaquah, WA 98027

bbstvnsn15@gmail.com

November 1, 2017

Don't let Tesoro export Xylenes!

Dear Skagit County Planning and Development Services,

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Patricia Holm

3803 Giles Rd NE

Olympia, WA 98506

pholm76@gmail.com

November 1, 2017

EIS for the Tesoro Anacortes Refinery CPUP is flawed

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2877 N Nugent Rd M-1

Lummi Island, WA 98262

myrabramos@icloud.com

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william phipps

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Edmonds, WA 98026

bebopbill@yahoo.com

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Lynn Rabenstein

201 N. Section St.

Burlington, WA 98233

lynnrabenstein@hotmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Norm Conrad

919 N97th St

Seattle, WA 98103

nsconrad@gmail.com

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Emily Johnston

13421 26th Ave NE

Seattle, WA 98215

enjohnston@gmail.com

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Tika Bordelon

1400 Hubbell Pl

Seattle, WA 98101

tikab1@gmail.com

November 1, 2017

CPUP Shoreline Substantial Development Permit

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Cailin Trimble

10226 56th Ave S

Seattle, WA 98178

cailintrimble@gmail.com

November 1, 2017

Toxic flammable petrochemicals and are regional quality of life.

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Marty Adams

133 140th Ave SE

La Conner, WA 98257

madams32931@frontier.com

November 1, 2017

Oil refinery

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Tess Nafziger

412 18th Ave SE

Olympia, WA 98501

tess_nafziger@hotmail.com

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Delia Gerhard

117 NW 80th St

Seattle, WA 98117

djgerhard@gmail.com

November 1, 2017

Potential Spills - it's not "IF" but "WHEN"

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Jeanne McLaughlin

12291 SE 310th Lane

Auburn, WA 98092

jamclaughlin60@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Jerry Kessinger

19122 2nd Ave SE

Bothell, WA 98203

jerrykessinger@me.com

November 1, 2017

Tesoro anacortea

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Dennis Marceron

3720 37th Ave S

Seattle, WA 98144

denmatmar@yahoo.com

November 1, 2017

No Xylene Production or Exports

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Julia Hurd

19396 Ashe Ln

Burlington, WA 98233

hurdjulia@gmail.com

November 1, 2017

Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP)

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Chris Kanit Cottrell

8027 California Ave SW

Seattle, WA 98136

ckanitc@gmail.com

November 1, 2017

No chemical and oil exports

Dear Skagit County Planning and Development Services,

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Barbara Rosenkotter

201 Crest Drive

Deer Harbor, WA 98243

skye@ucdavis-alumni.com

November 1, 2017

Tesoro refinery

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Steven Goldman

E 64

Ny, NY 10065

semelg@aol.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Mark Blitzner

8047 Earl Avenue NW

Seattle, WA 98117

pfeffer828@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Timothy Beitel

Villa Avenue

Pitman, NJ 8071

beiteltimothy@gmail.com

November 1, 2017

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Liz Washburn

2930 W Maplewood Ave

Bellingham, WA 98225

lizharmony@msn.com

November 1, 2017

Comment Letter on Tesoro Savage DEIS

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Erik Swenson

East Mercer Way

Mercer Island, WA 98040

eswenson@u.washington.edu

November 1, 2017

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Barbara Gregory

3538 NE 86th St

Seattle, WA 98115

barbara_gregory@yahoo.com

November 1, 2017

NO Refinery

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Russell Dial

317 E 45th St

Tacoma, WA 98404

Kane75@gmail.com

November 1, 2017

CPUP environmental impact

Dear Skagit County Planning and Development Services,

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Keith Cowan

3709 SW Trenton St

Seattle, WA 98126

leftymanu@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Deanna Armstrong

3151 Alki Ave SW, #19

Seattle, WA 98116

deannaarmstrong@yahoo.com

November 1, 2017

Refinery in Anacortes and xylenes

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Linda Studley

4610 135 St NE

Marysville, WA 98271

ruralrunner62@yahoo.com

November 1, 2017

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Tracy Ouellette

14078 MacTaggart Ave

Bow, WA 98232

tracyjouellette@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP

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Margaret Wallace

11917 8th Ave SW

Burien, WA 98146

margywallace@gmail.com

November 1, 2017

Stop crude oil exports

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Vicky Gannon

2125 1st Avenue, #2701

Seattle, WA 98121

gannonvicky@yahoo.com

November 1, 2017

Stop crude oil exports

Dear Skagit County Planning and Development Services,

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Robert Fulmer

3902 13th Ave S

Seattle, WA 98108

robertfulmer99@yahoo.com

November 1, 2017

Crude oil and chemical exports effect on the Salish Sea

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Sandra Johnson

2242 NE 177th St

Seattle, WA 98155

sanjohn27@gmail.com

November 1, 2017

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Ralee Bankston

3527 S. Bennett

Seattle, WA 98118

ralee@stylesville.com

November 1, 2017

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Betsy Kinsey

5242 12th Ave NE

Seattle, WA 98105

bkinsey1228@gmail.com

November 1, 2017

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judith cohen

1608 E. Republican St.

Seattle, WA 98112

jctcohen@yahoo.com

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Sally Radford

6438 south warner

Tacoma, WA 98409

sallyradd@yahoo.com

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Ruth Darden

900 University St #401

Seattle, WA 98115

dseattlered@seanet.com

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Sandra Smith

329 17th Ave

Seattle, WA 98122

7schipperkes@gmail.com

November 1, 2017

No more tankers in the Salish Sea

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Lela Perkins

3823 W Olympic

Spokane, WA 99205

lelaperkins@comcast.net

November 1, 2017

expansion of Tesoro Anacortes Refinery

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Karen Moskowitz

922 30th Ave

Seattle, WA 98122

karen@moskowitz.com

November 1, 2017

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Joanne Zabik

19636 Landing Rd

Mount Vernon, WA 98273

jewelrydivan@yahoo.com

November 1, 2017

stand up to oil

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Ann Kittredge

PO box 763

Quilcene, WA 98376

marnykit@gmail.com

November 1, 2017

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Cigdem Capan

1701 Gray St

Richland, WA 99352

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Elaine Becker

2514 Sharmar Rd.

Roanoke, VA 24018

elainebecker@yahoo.com

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Kristy Overton

2625 SE Hawthorne Blvd

Portland, OR 97214

kristygoverton@gmail.com

November 1, 2017

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Rebecca Canright

11589 Martin Rd

Rockport, WA 98283

rebeccagroovypeace@gmail.com

November 1, 2017

stop crude oil and chemical exports through Anacortes

Dear Skagit County Planning and Development Services,

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Ellen Epstein

1931 4th St

Bremerton, WA 98337

ellenepstein@yahoo.com

November 1, 2017

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Carol Else

9702 Veterans Dr SW

Lakewood, WA 98498

l.else@comcast.net

November 1, 2017

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suzanne wittmann

1140 alki ave sw

seattle, WA 98116

smoothwater2000@comcast.net

November 1, 2017

Please do not allow crude oil and chemical exports through Anacortes

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Brian Baltin

500 13th Ave East #107

Seattle, WA 98102

bbaltin@earthlink.net

November 1, 2017

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Jennifer Purcell

218 Sea Pines Rd

Bellingham, WA 98229

seapenwriting@hotmail.com

November 1, 2017

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Arnold Strang

23607 47th Pl. W.

Mountlake Terrace, WA 98043

adstrang@comcast.net

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Gena DiLabio

3124 Dakota Dr.

Mt. Vernon, WA 98274

gdilabio@frontier.com

November 1, 2017

Oil and Chemical Exports

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Bob Hannigan

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Corvallis, OR 97330

hanniganjb@comcast.net

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Harry Gerecke

10220 SW 127th St

Vashon, WA 98070

hgerecke@yahoo.com

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Richard Horner

1752 NW Market St #551

Seattle, WA 98107

rrhorner@msn.com

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Cindi Lund

338 Shoreland Drive

Lopez Island, WA 98261

cindilund@sbcglobal.net

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Victoria Urias

14001 35th Ave NE

Seattle, WA 98125

vickiurias@comcast.net

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Graham Hubenthal

18542 Swanson Lane

Camano Island, WA 98292

huben@ncia.com

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Gary A Piazzon

PO Box 1523

Coupeville, WA 98239

piazzon@comcast.net

November 1, 2017

Shoreline Development

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Wendy Eash-Loucks

1607 N 183rd St

Shoreline, WA 98133

Weashloucks@gmail.com

November 1, 2017

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Adrian Laurenzi

2624 Western Ave Apt 301

Seattle, WA 98121

adrian.laurenzi@gmail.com

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Audrey Meade

4126 42nd Ave S

Seattle, WA 98118

audreebee@yahoo.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

E Ellis

PO Box 1701

Aberdeen, WA 98520

ictrees4u@yahoo.com

November 1, 2017

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Timothy Muirhead

6756 39th Avenue SW

Seattle, WA 98136

tjmuirhead@gmail.com

November 1, 2017

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Catherine Pottinger

165 14th Ave #207

Seattle, WA 98122

cpottinger2012@aol.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Marian Cruz

1765 Shuey Ave223

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marian.cruz2903@gmail.com

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katy mcfadden

313 SW Maricara St

Portland, OR 97219

katytmcfadden@gmail.com

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Sheila Gille

16003 2nd PI SE

Duvall, WA 98019

sheilamg@broadstripe.net

November 1, 2017

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Doris (Jody) Wilson

12711 NE 129th Ct #G-104

Kirkland, WA 98034

jodyhere24doris@comcast.net

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Erin Gubelman

6505 4th Ave

Seattle, WA 98117

kasadreams@gmail.com

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Curt Wolters

2140 Wildflower Ct

Bellingham, WA 98229

curtcfwolters@yahoo.com

November 1, 2017

Shoreline Substantial Development Permit

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Tasha Essen

616 - 29th Ave E

Seattle, WA 98112

tessen27@gmail.com

November 1, 2017

Reject permits for the Aromatics Recovery Unit and storage tanks

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Virginia Davis

17721 NE 156th Street

Woodinville, WA 98072

ginny1218@yahoo.com

November 1, 2017

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Philip Ratcliff

4665 Tragen Ct SE

Salem, OR 97302

skazz999w@hotmail.com

November 1, 2017

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Joy Gardner

21121. 77th Pl. W.

Edmonds, WA 98026

gardnerjoylyn@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery Clean Products Upgrade Project

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Toni Okada

2909 84th SE

Mercer Island, WA 98040

td.okada@yahoo.com

November 1, 2017

Stop Crude Oil & Chemical Exports Through Anacortes

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Lori Erbs

PO Box 50

Acme, WA 98220

lorieji@cs.com

November 1, 2017

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Stacy Oaks

2417 86th St NE

Tulalip, WA 98271

eddyssunprincess@gmail.com

November 1, 2017

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Andrea Finley

100 Vera Ln

Lopez Island, WA 98261

andefinley@gmail.com

November 1, 2017

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Thank you for accepting and considering these comments.

Lauren Tozzi

4648 Sunnyside N

Seattle, WA 98103

lrntozzi2@gmail.com

November 1, 2017

No to xylene production and/or exportation in Anacortes

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Thank you for accepting and considering these comments.

Tina McKim

2333 Humboldt St

Bellingham, WA 98225

tinamckim@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

Janie Lyle

30452 10th Ave. S.

Federal Way, WA 98003

scientia_et_lux@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Yonit Yogev

821 kaiser rd nw

Olympia, WA 98502

yonityogev@yahoo.com

November 1, 2017

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Thank you for accepting and considering these comments.

Gail Hudson

401 West Crockett St

Seattle, WA 98119

gailhudson@comcast.net

November 1, 2017

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Thank you for accepting and considering these comments.

Jodie Galvan

11844 102nd PI NE

Kirkland, WA 98034

jodie_0606@hotmail.com

November 1, 2017

Tesoro's "Clean Products" Upgrade Project

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

Katherine Chesick

1039 NE 127th St

Seattle, WA 98125

kchesick@earthlink.net

November 1, 2017

Please Protect Our Water, for the People and Environment - Vote No on Permit

Dear Skagit County Planning and Development Services,

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Barbara Phinney

12248 Phinney Ave N

Seattle, WA 98133

bphinney@mac.com

November 1, 2017

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Thank you for accepting and considering these comments.

Shirley Campbell

605 N 64th street

Seattle, WA 98103

zil@uw.edu

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Jeanne Poirier

PO Box 228

Cashmere, WA 98815

jeannepoirier@yahoo.com

November 1, 2017

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Lisa Nash

10753 Palatine Ave N

Seattle, WA 98133

mrsldnash@yahoo.com

November 1, 2017

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Eric Fosburgh

1415 E Republican St #203

Seattle, WA 98112

ericfosburgh@gmail.com

November 1, 2017

Tell them NO preserve our quality of life please!

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Delius Raymond

PO 306

La Conner, WA 98257

delius.raymond@gmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Nick Barcott

1318 N Lake Stickney Dr

Lynnwood, WA 98087

nbarcott@msn.com

November 1, 2017

ATTN: OSMRE, John Henry EA

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William Young

4421 E Oregon St

Bellingham, WA 98226

loon13@comcast.net

November 1, 2017

Tesoro Application--Please Withhold

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Thank you for accepting and considering these comments.

Dr. Michael Berres

3040 Silvern Ln

Bellingham, WA 98226

ammab81@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

As a long-time visitor, fan, weekend warrior in Skagit County, I thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Please for the sake of our children's children. I want them also to enjoy Skagit County.

Thank you for accepting and considering these comments.

Barbara Hirsch

9240 2nd Ave SW

Seattle, WA 98106

barbaura@gmail.com

November 1, 2017

Tesoro terminal

Dear Skagit County Planning and Development Services,

As a proud Washingtonian and resident of Skagit County, I am vehemently opposed to any projects that increase the risk of further pollution in the Salish Sea. We must not put our waterways in danger by allowing the petro-chemical industry to expand their harmful refining and transportation practices. I cannot overstate the urgency of addressing immediately the impact of fossil fuel consumption on our environment. We here in Washington can send a clear message that our state is looking to the future by making the tough, responsible decisions about fossil fuels today. We have been blessed with such a beautiful home, and we are entrusted with it's preservation and survival. Let us be worthy of that trust by saying no to those who would seek to exploit our lands and waters for their own benefit. Thank you.

Erik LaRue

17567 Maiben Rd

Burlington, WA 98233

pacific2626@gmail.com

November 1, 2017

Oppose xylene production at Anacortes refinery

Dear Skagit County Planning and Development Services,

As a resident of the San Juan Islands who frequents Skagit Valley and Anacortes and passes through Anacortes as a regular route between the islands and the mainland, I urge Skagit County to deny a permit for this refinery to produce and/or export xylene.

This volatile chemical, made from a form of benzene, can be leaked in its liquid form into our water ways and soil and in its evaporated form into our airways, exposing humans and wildlife to this harmful chemical, which has a direct effect on the central nervous system. Long-term exposure to even small concentrations of this toxic chemical is known to result in short-term memory loss and numerous irritating symptoms involving the central nervous system, liver, and kidneys. We really do not know its full effects on children or on wildlife because they have not been studied.

In the current era of weakening regulations within our Environmental Protection Agency, it is particularly dangerous to expand the production of such toxic and volatile chemicals. The number of Superfund "cleanup" sites around our nation that are not actually being cleaned but which are resulting in unintended releases of harmful chemicals into our air, waterways, and soil, should not continue to increase.

We do not need to provide sites of manufacture of this dangerous chemical just to export it to support plastic industries in other nations. This would expose too many Washingtonians and visitors, as well as wildlife to this toxic chemical and the wastes such manufacturing produces for the foreseeable future. The certain and potential damage to the environment is not worth the small number of dangerous jobs it would create. In addition, there are already several sites around the United States that manufacture petrochemicals, including xylene. More are not needed to sustain the industry.

Permitting the manufacture and/or export of xylene will stain this site for the remainder of our natural lives and unfortunately for even longer. Please read about the chemical refineries in the Houston, Texas area that were supposedly being protected from events of toxic release but which resulted in uncontrolled release of unhealthy levels of toxic chemicals when the recent floods occurred. Events will occur that will result in the release of toxic chemicals from such sites. It always happens, no matter what controls are put in place, and even with standard activities not involving natural disasters.

The farmland of Skagit County and its towns, Anacortes and the surrounding waters of the Salish Sea are extremely valuable resources that must be protected from any further development of the petrochemical industry in this area.

LeeAnn Chastain

35 Myth Road

Eastsound, WA 98245

lachastain@aol.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

As a San Juan County resident, I'm writing to thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

Mary Masters

123 Falling Tree Rd.

Orcas, WA 98280

mastersmh@gmail.com

November 1, 2017

Denial of Permit to Tesora Anacortes Refinery to Produce and Export Xylene Products

Dear Skagit County Planning and Development Services,

As someone who has had serious life repercussions as a result to the exposure of toxic petrochemicals approved by the EPA, I appreciate the opportunity to provide my response to the permit application you are considering and request that among all the other legal and scientific aspects you consider, that you first recognize that should you grant the permit, you would be allowing the POTENTIAL for very harmful materials to be exposed to all life forms, whether in the production process or the distribution process.

We have all witnessed that this "potential" is real and cannot be denied or mitigated by safety promises made now or monetary payments later -- when failures to mitigate occur.

For all other aspects that you are considering, I am in support the information below:

I understand that the permit is referred to as the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Alline Thurlow

946 Broadway E., Apt. 1

Seattle, WA 98102

alline.thurlow@gmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Dear Ms. Stevenson,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Marilyn Tuohy

4901 54th Ave. S

Seattle, WA 98118

mtuohy75@gmail.com

November 1, 2017

Tesoro Anacortes Refinery

Dear Skagit County Planning and Development Services,

Facts of Tesoro's project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement.

The EIS is fundamentally flawed and ask you to require further evaluation of the impacts of this project:

The EIS does not cover Vessel Traffic Spill Risks and Marine Impacts

or Greenhouse Gas Pollution

or Process Safety Management

or Alternatives to current proposal

or Water Quality

The County isn't using its full authority to manage the risks of this project.

A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for unloading gasoline blendstock, loading mixed xylenes and loading crude oil for export

The dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent.

Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes.

Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

Look carefully at the concerns and objections outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Jane Beattie

PO Box 1434

Ketchum, ID 83340

rbmt80@yahoo.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Hi,

Please help to stop the madness of the pollution and destruction caused by the fossil fuel and petrochemical industries. As a state, nation, and world we need to phase out our use of these filthy substance. The idea of putting profits or even jobs before the protection of our land and water is short sighted and dangerous.

Kevin Hughes

1206 11th St

Anacortes, WA 98221

anevolver@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I am adopting the following message because it is important. please read on.

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

katrina pflaumer

925 12th ave east

seattle, WA 98102

katepflaumer@aol.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I am an avid sea kaker in the beautiful San Juans, and thus deeply concerned that facts of this project and its impacts are not fully known or accounted for in the current Environmental Impact Statement (EIS).

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project that threaten your beautiful area. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylene. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Greg Saul

1533 211th Ave NE

Sammamish, WA 98074

gwsaul@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I am offering my public comment on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

Protecting the environment is my top priority. The EIS for this proposed project is fundamentally flawed. Please therefore require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for this opportunity to comment.

Sara Bhakti

521 7th Ave

Kirkland, WA 98033

sarabhakti@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I am very much AGAINST the production and exporting of xylenes...which are nothing more than toxic, flammable petrochemicals!!...by the Tesoro Anacortes Refinery in Anacortes!! I am AGAINST this production because it would add 60+ more tanker ships in the Salish Sea and all the dangers and risks THAT includes, which we definitely DON'T NEED!!

So vote AGAINST this entire idea...and thanks so much for all your help!

David Scheer

2715 Cody Circle #102

Bellingham, WA 98225

scheerdc@outlook.com

November 1, 2017

Tesoro Anacortes Refinery

Dear Skagit County Planning and Development Services,

I am writing to respectfully request that you reject the application for Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I share the concerns of many in our region regarding the following potentially harmful environmental effects of their proposed project:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

I believe that a more thorough EIS is needed.

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for the opportunity to participate in this process and for your consideration of my concerns.

Christine Taylor

3205 NE 47th Ave

Portland, OR 97213

litasberrypatch@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I believe protection of the Puget Sound and in fact the earth, is vital for our welfare. I want to thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Kathryn Fletcher

1531 29th Ave

Seattle, WA 98122

diazfletcher52@comcast.net

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I have read the points below and agree fully with each point. I just hope that you have read them carefully, Betsy, and understand how harmful Tesoro's plans can be to our environment.

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

John Holstein

4915 Samish Way

Bellingham, WA 98229

jfholstein@yahoo.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I urge you to withhold any decision that moves the proposed Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP) forward until the concerns outlined below have been addressed.

I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic, Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

David Perk

842 NE 67th St

Seattle, WA 98115

davidperk@comcast.net

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

I would like to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

I would like you, as an elected Official, to put the citizens of Skagit County and the rest of the citizens of Washington state first. Your job is to weigh the risks and the benefits of this project to export by-products of crude refining to a Asia. How does this benefit our local citizens? What are we putting at risk.

For one it will not benefit anyone, there will be no more jobs generated than the salmon jobs that have already been decimated from all the shipping traffic we already experience. We have some of the last remaining wild salmon runs in the World and you would be willing to put the nail in their coffin? For what? That is the question that remains. Except we must also ask Why?

What is in our National interest? We need to protect and enhance our wild food production, wild salmon are already pushed to the breaking point by many factors not the least the Net pen release of hundreds of thousands of Atlantic salmon full of BCBs and antibiotics and colorings. The ships that anchor in Samish bay cause harm to the sea floor and the ecosystem by their bulge pumps and anchor chains, and that is just a small example. Do you know what the propellers chop up in their travels, small salmon fry, young crab larvae, bait fish?

This is transporting toxic materials through Puget Sound, we can not afford to have more ships traversing this tight and overused route, as they push out migrating fish.

The EIS leaves out some pretty important information and you must required more evaluation on the impacts specifically as I have alluded to, vessel traffic spill risks and marine impacts.

What are the safety plans, as we learned in the net pen escape, there we not adequate plans for escapement containment, an oil or Xylene spill would not be cleaned up and we risk everything (health of the Puget Sound) for nothing (how does this benefit me and my neighbors?) in return.

Please do your job, do not be a pawn for industry, but stick up for what is right, good, and honorable for the people and environment of the greater Puget Sound region and the people of Skagit County in particular.

I urge you to deny this permit as incompatible with healthy practice and also the National interest.

Exporting our fuel seems rather fool hearty and shortsighted.

Thank you for taking my comments to heart and voting to deny this permit for an expansion of Tesoro's current permitted activities .

Laura L Brakke

585 Pleasant Bay Rd

Bellingham, WA 98229

llbrakke@hotmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

It is now the 21st Century! Surely, we have the capability (if not the will) to do the right thing and move toward clean energy, clean manufacturing, clean living! No more toxic chemicals in our oceans, wild spaces and communities!

Elaine Green

3 Catkin Ct

Bellingham, WA 98229

posterpage@comcast.net

November 1, 2017

Regarding the Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

It seems that we just stop one fossil fuel project on the shores of the Salish Sea and another one pops up on the radar.

Don't the oil and coal companies get the message that the people of this area value clean air and clean water, orcas, salmon, and future generations of Washingtonians more than the money they generate from their expanded polluting operations?

As a Ph.D. in Energy and Environmental Policy, I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Kathleen Saul

3103 31st Court SE

Olympia, WA 98501

kmsaul@comcast.net

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

My largest concern about this facility is its potential ability to export crude oil. Fossil fuel burning, extraction and transport is leading to a human habitat crisis that we are utterly unprepared for. Anything we can do to stop the development or expansion of fossil fuels, we must do, for the sake of human life on this planet.

While we may be protected a little longer from climate change here in the northwest, we must do our part to protect others, who face immediate, dire consequences from fossil fuels.

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Aubrey Pullman

2037 South Washington Street

Seattle, WA 98144

aubrey@rendermack.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Please do not harm. Why continue to risk air, water, soil, human and animal communities? There are clean, safe energy solutions available for all! Big energy industry, and politicians who give them the green light, benefit a select few for only a few more generations. Wrecking our one planet and supporting inequality is shortsighted, to put it mildly. Who do you really want to be?

Thank for this opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Nora Comeau

19527 22nd PI NW

Shoreline, WA 98177

Noralark@gmail.com

November 1, 2017

Tesoro Anacortes Refinery Permit

Dear Skagit County Planning and Development Services,

Please do whatever is in your power to stop plans for a shoreline permit for Tesoro. Anything you decide in Skagit County will effect the lives and waters where I live. We must begin to move toward ways to developing industry that will not continue to harm the environment and towards ways that embody respect for the planet and all of us who live, eat, and breath here.

Thank you

Mallory Clarke

4000 37th Ave S

Seattle, WA 98118

tiamalby@gmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Please reject the Tesoro Anacortes Refinery proposal to begin producing and exporting xylenes. This dangerous proposal would endanger local residents as well as Puget Sound with potential fires and spills. These are highly toxic petrochemicals that could destroy both lives and marine employment forever!

Ann Wales

2545 Mackenzie Rd

Bellingham, WA 98226

trout222@abhost.us

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Please stop Tesoro from shipping & producing xylene @ other toxic, flammable chemicals Protect our healthy environment please.

Shirley Bennett

P O Box 427

Coupeville, WA 98239

s9ben11@comcast.net

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Producing and exporting xylene from the Tesoro Anacortes Refinery in Anacortes is a terrible idea.

A partial list of issues: Â

* The risk of an oil spill will be greatly increased if 60 more tankers carry toxic chemicals through the Salish Sea each year. Â Â

* The Environmental Impact Statement is fundamentally flawed and ignores key concerns around vessel traffic, greenhouse gases, and safety.

â€¢ Â Â The County isnâ€™t using its full authority to prohibit Tesoro from becoming an export facility.

Â

Please say no to this project.

Thank you,

Â

Nancy Johnson

9411 216th St SW

Edmonds, WA 98020

najohnso@operamail.com

November 1, 2017

XYlenes at Tesoro Refinery

Dear Skagit County Planning and Development Services,

Shipping toxic xylene from Anacortes would endanger our Salish Sea and the marine life that is already struggling. The sustainable jobs that depend on a healthy environment, like fisheries and tourism, would also be threatened. Please do NOT permit this!

Libby Hazen

116 Bayside Pl

Bellingham, WA 98225

libmh@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide my comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

As a local resident I am concerned that the details of this project and its impacts have not been thoroughly investigated and are not accounted for within the current Environmental Impact Statement (EIS).

The EIS is flawed and we urge you to require further evaluation of the impacts of this project, prior to making any decisions, including those related to:

- Comprehensive Impact to the Salish Sea; Vessel Traffic Spill Risks
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Fresh & Salt Water Quality

In addition, I ask the County represent all Constituents, not just the industry or those with immediate near term benefits by using its delegated authority to evaluate and manage the comprehensive long term risks (risk benefit analysis) of this project.

A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, this will enable the County to avoid the county becoming a petrochemical export center (which reduces/eliminates jobs) by restricting new uses for:

- Loading crude oil for export
- Unloading reformat
- Loading gasoline blend stock
- Loading mixed xylenes

The dual objectives of the CPUP aggregated for the EIS, are not co-dependent. While there are benefits to upgrade reducing sulfur in fuels these are separate from upgrades to produce and export xylenes. This starts a path toward becoming a petrochemical export facility. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

As a recently retired refining industry executive, I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for considering my comments.

Dirk Vermeeren

912 queen street

Bellingham, WA 98226

seattle.expresso@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide my comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

As a local resident I am concerned that the details of this project and its impacts have not been thoroughly investigated and are not accounted for within the current Environmental Impact Statement (EIS).

The EIS is flawed and we urge you to require further evaluation of the impacts of this project, prior to making any decisions, including those related to:

- Comprehensive Impact to the Salish Sea; Vessel Traffic Spill Risks
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Fresh & Salt Water Quality

In addition, I ask the County represent all Constituents, not just the industry or those with immediate near term benefits by using its delegated authority to evaluate and manage the comprehensive long term risks (risk benefit analysis) of this project.

A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, this will enable the County to avoid the county becoming a petrochemical export center (which reduces/eliminates jobs) by restricting new uses for:

- Loading crude oil for export
- Unloading reformat
- Loading gasoline blend stock
- Loading mixed xylenes

The dual objectives of the CPUP aggregated for the EIS, are not co-dependent. While there are benefits to upgrade reducing sulfur in fuels these are separate from upgrades to produce and export xylenes. This starts a path toward becoming a petrochemical export facility. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

As a recently retired refining industry executive, I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

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Bellingham, WA 98226

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November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS).

The EIS is fundamentally flawed and I urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Jay Lazerwitz

6126 12th Ave NE

Seattle, WA 98115

geno@artandarch.net

November 1, 2017

Thoughts on Development Permit for the Tesoro Anacortes Refinery Upgrade...

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

I am writing today to express my concern that the full DETAILS of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, it worries me that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Lydia Olchoff

4303 Phinney Ave N #5

Seattle, WA 98103

lolchoff@hotmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). As a former WA state resident, I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Eric Edwards

4580 E Weatherby Ave

Post Falls, WA 83854

eeguinness@hotmail.com

November 1, 2017

Tesoro Anacortes Refinery Clean Products Upgrade Project comment

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). As a resident near the Salish Sea, I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Andrea Avni

11515 105th Place SW

Vashon Island, WA 98070

andrea.avni@gmail.com

November 1, 2017

Tesoro Refinery Concerns

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). As a Washington State resident, and an industrial hygienist, I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
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- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Christopher Pyke

810 N M St

Tacoma, WA 98403

cpyke88@gmail.com

November 1, 2017

Please Deny the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery CPUP

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
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- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Mary Masters

123 Falling Tree Rd.

Orcas, WA 98280

mastersmh@gmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Regarding greenhouse gas pollution, the social costs of carbon, manifest in hurricane, flood, drought and wildfire death and destruction, must be accounted for. Without these protections, at every local decision level that incrementally influences life on planet Earth, we will fail to address these existential problems.

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
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Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Kevin Jones

PO Box 2607

Vashon, WA 98070

kevinjonvash@gmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
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Thank you for accepting and considering these comments.

John Cook

144 Terri Lane

Eastsound, WA 98245

j.cook64@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Richard Johnson

6 Overlake Court

Bellingham, WA 98229

jazzpacnw@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

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Thank you for accepting and considering these comments.

rosann wuebbels

11134 O Ave

anacortes, WA 98221

rwuebbels@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
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- Alternatives to current proposal
- Water Quality

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Thank you for accepting and considering these comments.

Adina Parsley

709 W. Wiser Lake Rd.

Stanwood, WA 98292

dickandpat3@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Phil Olsson

6130 Bayview Dr.

Mukilteo, WA 98275

phil.olsson@gmail.com

November 1, 2017

No xylene production or export

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
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Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Barbara Brock

3302 Walnut Court

Camano Island, WA 98282

wbbrock@wavecable.com

November 1, 2017

Environmental Safety

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

Mr. Claire Egtvedt

5904 96th St SW

Mukilteo, WA 98275

chegtvedt@comcast.net

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

Maggie Rose

4403 Bay Road

Blaine, WA 98230

maggie.a.rose@gmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Dan Mosby

13846 Avon Allen Road

Mount Vernon, WA 98273

kpeterson781@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery re. wanting to start producing and exporting xylenes

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

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Climate change is already taking its toll. It's now so important to stand firmly against any project where the facts are not fully known. WE cannot take chances on further pollution and safety regarding our air, water and shorelines. Also with five other partners we own a home on the Salish Sea on Orcas Island.

Thank you for accepting and considering these comments.

Sally Mackey

2127 SW 162nd St

Burien, WA 98166

sallynmnmac@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Sandra Wilson

POB 2209

Friday Harbor, WA 98250

gryph@msn.com

November 1, 2017

Tesoro Clean Products upgrade

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

I have read this and agree with all. Fossil fuels will be superceded on the market in the coming years and all of this investment and risk to our resources will be for naught.

Thank you for accepting and considering these comments.

Terry Sullivan

20929 111th Ave SW

Vashon, WA 98070

terry.sullivan46@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Virgene Link-New

PO Box 543

Anacortes, WA 98221

linkerwan@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Michael Betz

2630 Franklin

Bellingham, WA 98225

mwbetz@comcast.net

November 1, 2017

RE Tesoro Anacortes Refinery CPUP Shoreline Permit

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November 1, 2017

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Thank you for accepting and considering these comments.

In addition my uncles and cousins were involved in the fishing industry in LaConner from the 1930s through the early 60s; I would hate to see any more damage to salmon fishing caused by spills.

Jane Mortell

3033 NW 69 St

Seattle, WA 98117

jane.mortell@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Hilary Turner

28387 State Route 525

Coupeville, WA 98239

haturner579@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Sammy Low

709 W Wiser Lake Rd

Stanwood, WA 98292

cougarcreek7@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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My special concern is for the ever important quality of the water in Puget Sound. That quality is currently extremely stressed and even a small oil or other chemical spill would likely lead to a tipping point.

Thank you for accepting and considering these comments.

Steve Thompson

9050 Avondale Rd NE

Redmond, WA 98052

steve93thompson@gmail.com

November 1, 2017

Tesoro Anacortes Refinery Development

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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- Process Safety Management
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I am greatly concerned that the both human health and economic viability would be adversely affected by this project! Many sustainable jobs (e.g. in tourism and fisheries) in our area depend on a healthy marine environment. Just one shipping accident could end all that! I urge you not to permit this development!

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

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Thank you for accepting and considering these comments.

Libby Hazen

116 Bayside Pl

Bellingham, WA 98225

libmh@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Amelia Apfel

520 N 45th St Apt D

Seattle, WA 98103

amelia@pugetsoundkeeper.org

November 1, 2017

PLEASE Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit!

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Julie Glover

7292 Maxwellton Rd

Clinton, WA 98236

julieg@whidbey.com

November 1, 2017

Tesoro expansion

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). Living in the Salish Sea for nearly 60 years I have seen the negative impacts and dramatic increase of tanker traffic. The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
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Allowing more opportunities for toxic releases is not a good business or environmental decision!

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

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Thank you for accepting and considering these comments.

Suzanne Roundy

681 Lopez Road

Lopez Island, WA 98261

s.roundy@mac.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

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Thank you for accepting and considering these comments.

Nancy Quackenbush

56 Grove St

Eastsound, WA 98245

nkquackenbush@gmail.com

November 1, 2017

Xylenes are toxic, flammable petrochemicals

Dear Skagit County Planning and Development Services,

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Thank you for accepting and considering these comments.

Melvin Mackey

24430 Old Mill Road SW

Vashon, WA 98070

melvin_mackey@hotmail.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

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Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments. The safety and health of the Puget Sound ecosystem, and we who live here, deserve careful and thorough attention while we consider what development is in the citizenry's interest. Thank you for your time.

Eli Semke

513 Cherry St

Port Townsend, WA 98368

elisemke@gmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that the facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed, and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Patricia Warden

1907 87th Avenue Ct W

Renton, WA 98056

pjwarden1@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that the facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and I urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to the current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would allow the County to consider and restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, and Washington Environmental Council.

Thank you for accepting and considering these comments.

Polly Freeman

201 NW 60th

Seattle, WA 98107

polly_freeman@msn.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am gravely concerned about the impacts to our indigenous neighbors and their Treaty rights and cultural continuity. It seems that many of these kinds of projects throughout the Pacific Northwest are ignoring, understating and outright undermining the voice of our Tribes and Nations. Consultations need to take place and they need to take place with sincerity.

I am deeply concerned with environmental impacts that never seem to delve deep enough or reflect current science not only locally but globally as well. I am also concerned that impacts are not looked at cumulatively nor do they have the span and breath that considers impacts on the entire region (and globally as far as climate change is impacted). It appears that the facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

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Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Deborah J Cruz

1454 Willeys Lake Rd

Ferndale, WA 98248

dwacruz@comcast.net

November 1, 2017

Shoreline Substantial Development Permit for Tesoro Anacortes Refinery CPUP

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I spent many weekends and vacations as a youngster in the Biz Point neighborhood near Anacortes at our family cabin, and later as an adult visiting my parent's when they retired there. I love Skagit Valley and Anacortes area and am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and I urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformate
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Debby Jackson

PO Box 13091

Vashon, WA 98070

debby.jackson@centurytel.net

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP, though aggregated for the EIS, are not co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks must be withheld.

For the health and longevity of Anacortes, Skagit County and the Salish Sea,

Dina Winkel

NENaomi PI

Seattle, WA 98115

dina.winkel@gmail.com

November 1, 2017

Tesoro Anacortes Refinery

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP).

I want CLEAN air and water and I do NOT believe that producing and shipping xylenes through OUR waters is in OUR best interests or the health of our local ecosystems. I do NOT believe that Tesoro is a good environmental steward or that they tell us the truth.

I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Kelly McConnell

11375 SW Erste Pl

Tigard, OR 97223

prvt@2ezgroup.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project / CPUP. I am deeply concerned that facts of this project and its impacts are NOT fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally FLAWED and we urge you to require further evaluation of the impacts of this project, including those related to :

- Vessel Traffic Spill Risks and Marine Impacts
- Greenhouse Gas Pollution
- Process Safety Management
- Alternatives to current proposal
- Water Quality

Additionally, I am concerned that the County is NOT using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be REQUIRED for new and existing over-water structures at the marine terminal, which would enable the County to restrict new uses for :

- Unloading reformat
- Loading gasoline blendstock
- Loading mixed xylenes
- Loading crude oil for export

Finally, the dual objectives of the CPUP (though aggregated for the EIS) are NOT co-dependent. Upgrades to reduce sulfur in fuels are separate from upgrades to produce and export xylenes. Until SEPA issues are resolved, construction permits for the Aromatics Recovery Unit and storage tanks MUST be withheld.

I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Marco de la Rosa

12700 NE 124th St.

Kirkland, WA 98034

marco_de_la_rosa@hotmail.com

November 1, 2017

Keep Anacortes A little GREENER, at least...

Dear Skagit County Planning and Development Services,

Thank you so very much, for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

Mark Tanis

Island View

Anacortes, WA 98221

markatanis@yahoo.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

This permit shall be denied based on the fact that if a toxic, flammable petrochemical were to get into the environment the consequences would be CATASTROPHIC for the ecosystem! The people of Washington state would never agree to produce or export xylenes – toxic, flammable petrochemicals this would be a RISK to beautiful Puget Sound region. My advise to Tesoro is you better start producing clean energy and shut down anything that has to do with producing fossil fuels or toxic chemical. As far as I am concerned Tesoro Anacortes Refinery is premeditating to do great harm to the people and the environment of Washington state and this is absolutely WRONG! We the people of the State of Washington DEMAND to stop crude oil and chemical exports through Anacortes.

Naomi Carey

718 198th Pl SE

Bothell, WA 98012

n.c.carey@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

To Whom it May Concern:

â€¢ That the Environmental Impact Statement is fundamentally flawed and ignores key concerns around vessel traffic, greenhouse gases, and safety.

â€¢ The County isnâ€™t using its full authority to prohibit Tesoro from becoming an export facility.

County residents will not stand for a new project that increases the risk of oil spills in the Salish Sea and threatens human health.

Thank you.

Virgene Link-New

PO Box 543

Anacortes, WA 98221

linkerwan@yahoo.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

We don't need more poisons in this world. How about looking for some other way to make money that will support the planet?

Thrinley DiMarco

865 Bullfrog Rd

Friday Harbor, WA 98250

thrinley@nreek.net

November 1, 2017

crude oil and chemical export through Anacortes

Dear Skagit County Planning and Development Services,

We must finally wake up to the real threat these industries pose to our oceans and overall environment. Every extra effort should be made to fully understand the possible impacts. When will the madness stop and the governing agencies in power seek to reduce our risk, rather than worry about the risks to the business industry?

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Sheri Staley

6052 E Pickering Rd

Shelton, WA 98584

staleyagate@peoplepc.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

We need to keep fossil fuels in the ground and focus on clean, green energy. Pipelines carrying crude oil have proven to be a danger to us and our environment.

No more fossil fuels for me,

No more, no more

No more fossil fuels for me

Let's have them all gone!

Laura Goldberg

9225 N Cedarvale Loop Rd

Arlington, WA 98223

dickandlaura@peoplepc.com

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

We need to look closely at whether or not this benefits our community.

This will not produce a significant number of new jobs.

It will increase the number of tankers in the Salish Sea. Each increase increases the likelihood of a spill. Needless to say a spill in this area would be disastrous.

Xylene is toxic. Plastics are a huge concern in our waters.

We need disparately towards clean energy. This will move us in the opposite direction.

Thank you for reading my comments.

Mary Brady

3739 Birch Way

Anacortes, WA 98221

bradypower@comcast.net

November 1, 2017

Withhold decision on Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

We need your help to protect our precious lands and waters, and the people of Washington State.

Block the proposed production of xylenes at Tesoro Refinery in Anacortes.

Thank you

Deborah Parker

55 Windward Dr

Bellingham, WA 98229

firstplanetarian@hotmail.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

What percentage of Tesoro Owners and/or Investors reside or have employees who reside in those areas where xylenes will be processed for shipping?

Would Tesoro be willing to place a 1 billion dollar bond (not a promise) to address probable suits regarding cataclysmic accidents & clean-up costs, increased Workman's Comp claims, and citizen-related health issues?

Rather than tax breaks, have 10x the current taxes been considered as a means of collecting funds to address future disasters been considered?

James Soares

PO Box 559

Everson, WA 98247

soares6474@gmail.com

November 1, 2017

Stop crude oil and chemical exports through Anacortes

Dear Skagit County Planning and Development Services,

Thank you so very much, for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

- Vessel Traffic Spill Risks and Marine Impacts
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- Alternatives to current proposal
- Water Quality

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- Unloading reformate
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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

Thank you for accepting and considering these comments.

Kim Hanke

18930 Bothell Everett Hwy

Bothell, WA 98012

kimnoadvertising@comcast.net

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

ABSOLUTELY NO CRUDE OIL AND CHEMICAL EXPORTS THROUGH ANACURTES...!!!

Stephen Durbin

1251 Rickover Dr

Coupeville, WA 98239

kilo34@cablespeed.com

November 1, 2017

Tesoro Anacortes Refinery CPUP Shoreline Permit

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). The facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The Environmental Impact Statement is fundamentally flawed and ignores key concerns around vessel traffic, greenhouse gases, and safety.

The proposed facility expansion will bring an estimated 60 more tankers carrying toxic chemicals through the Salish Sea each year, it could also enable Tesoro to become an export terminal, dramatically increasing the risk of an oil spill in local waters.

My specific concern is that Xylene or Xylenes are a toxic, flammable petrochemical, often a combination including benzene, a known carcinogen. A 2001 study is quoted below -

“Effect of benzene, toluene, xylene on the semen quality and the function of accessory gonad of exposed workers.

Xiao G., Pan C., Cai Y., Lin H. and Fu Z. Industrial Health. 2001, Apr; 39(2):206-10.

“The effects on semen and the function of accessory gonad of workers after short and long term exposure to benzene, toluene, and xylene were examined. These results suggest that the mixture of these solvents could affect the sperm and the function of accessory gonad. This might be one reason of the abnormal pregnancy outcome among the wives of workers exposed to benzene, toluene, and xylene.

“Studies reporting no increased risk of adverse developmental or reproductive outcomes: No reports were identified for this category.”

Clearly, Xylene is NOT HARMLESS and its negative effects on workers have been documented. In the 1980’s animal studies also showed concerning reproductive effects in lab animals.

Because of this, the transport of this chemical, many times a year through the Salish Sea navigation, is extremely problematic for accidents. There are predicted large increases in oil tanker traffic due to oil pipeline and port enhancements currently being built out in Canada. Xylene in the waters of Salish Sea could be catastrophic to life.

The EIS is inadequate to take these facts into account. Further, a spill of this chemical is not the same as an oil spill. It reacts differently in the environment due to a difference in volatility. There is already a dearth of spill prevention and mitigation “cleanup” first response equipment in and around the Salish Sea. How will this additional burden of potential chemical spill be planned for in advance?

The species of animals in Salish Sea, especially Orcas, are already under great survival pressure and may not survive another decade according to news reports of research. Why would we add to the possibility of catastrophe for our keystone species in the Salish Sea?

Additionally, I am concerned that the County isn't using its full authority to manage the risks of this project. A Shoreline Conditional Use Permit should be required for new and existing overwater structures at the marine terminal, which would enable the County to restrict new uses for:

- Unloading reformat
- Loading gasoline blendstock
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I share the concerns and objections that are outlined in the comments submitted by members of the Stand Up to Oil coalition: RE Sources for Sustainable Communities, Evergreen Islands, Stand.earth, Friends of the San Juans, Puget Soundkeeper, Friends of the Earth, Washington Environmental Council, as well as other organizations and individuals.

The Salish Sea can no longer be a dumping ground for ANYTHING PRODUCED BY HUMANS, whether intended or accidental. We must save this great water ecosystem from our stupidity and greed.

Thank you for accepting and considering these comments.

Paul Fellows

4220 Dayton Ave N

Seattle, WA 98103

pfellows@3fellows.net

November 1, 2017

Dear Skagit County Planning and Development Services,

Thank you for the opportunity to provide written public comments on the Shoreline Substantial Development Permit for the Tesoro Anacortes Refinery Clean Products Upgrade Project (CPUP). I am deeply concerned that facts of this project and its impacts are not fully known or accounted for through the existing Environmental Impact Statement (EIS). The EIS is fundamentally flawed and we urge you to require further evaluation of the impacts of this project, including those related to:

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Thank you for accepting and considering these comments.

Richard Johnson

6 Overlake Court

Bellingham, WA 98229

jazzpacnw@yahoo.com

NWCAA RULES

they don't follow these!

[From WA State Register; retrieved 6/13/16 from: <http://lawfilesexternal.wa.gov/law/wsr/2011/24/11-23-094.htm>

ODOR SOURCE - Any source that incurs two verified odor nuisance complaints within a twelve month time period. Odor nuisance complaints are verified by a NWCAA representative according to the criteria of the NWCAA Regulation Sections 530.1 and 535.3.

SECTION 530 - GENERAL NUISANCE

530.1 No person shall discharge from any source quantities of air contaminants, with the exception of odors as addressed in Section 535, in sufficient amounts and of such characteristics and duration as is likely to be injurious REGULATION OF THE NORTHWEST CLEAN AIR AGENCY 5-23 or cause damage to human health, plant or animal life, or property; or which unreasonably interferes with enjoyment of life and property. PASSED: December 4, 1970 AMENDED: April 14, 1993, March 13, 1997, March 9, 2000

SECTION 535 - ODOR CONTROL MEASURES

535.1 Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gasses emitted into the atmosphere to a reasonable minimum.

535.2 The Board or Control Officer may establish requirements that the building or equipment be enclosed and ventilated in such a way that odor-bearing gasses are effectively treated for removal or destruction of odorous matter or other air contaminants before emission to the atmosphere.

535.3 Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use *recognized best practices and control equipment* [TB says "best" = whatever Shell decides!] to reduce these odors to a reasonable minimum.

535.4 Odor emissions detrimental to persons or property. No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. PASSED: January 8, 1969 AMENDED: April 14, 1993, March 13, 1997, March 9, 2000

SECTION 540 - EMISSION OF AIR CONTAMINANT: CONCEALMENT AND MASKING

540.1 It shall be unlawful for any person to willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminant emitted, conceals an emission of air contaminant which would otherwise violate the emission standards of this Regulation.

540.2 It shall be unlawful for any person to cause or permit the installation or use of any device or use of any means designed to mask the emission of an air contaminant which causes detriment to health, safety, or welfare of any person. ...**DOES THAT APPLY TO the FAUX "SAFETY BADGES"???** PASSED: January 8, 1969 REGULATION OF THE NORTHWEST CLEAN AIR AGENCY 5-24

HMM... Shall I start trying to arrange "us" a meeting w/TB? ("us"=anybody who cares)

SECTION 550 - PREVENTING PARTICULATE MATTER FROM BECOMING AIRBORNE

550.1 It shall be unlawful for any person or operation to cause or permit material to be handled, transported or stored without using *Reasonably Available Control Technology* [to protect ourselves from sneakiness, “we” should learn what policies these labels represent] to prevent the release of fugitive particulate matter to the ambient air.

550.2 It shall be unlawful for any person to cause or permit a building or its appurtenances to be constructed, altered, repaired or demolished, or conduct abrasive blasting, without using Reasonably Available Control Technology to prevent the release of fugitive particulate matter to the ambient air.

550.3 It shall be unlawful for any person to cause or permit the release of fugitive particulate matter to the ambient air from public or private lots, roadways, or open areas without using Reasonably Available Control Technology.

550.4 It shall be unlawful for any person to cause or permit the emission of particulate matter which becomes deposited upon the property of others in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property. LIKE THE SOOT ON BOATS???

PASSED: January 8, 1969 AMENDED: February 14, 1973, August 9, 1978, October 14, 1987, April 14, 1993, November 12, 1999, July 14, 2005

SECTION 560 - STORAGE OF ORGANIC LIQUID

560.1 A person shall not place, store or hold in any stationary tank, reservoir or other container of more than 40,000 gallons, any petroleum liquids or a tank greater than 6,000 gallons capacity or greater containing other organic liquids or solvents having a True Vapor Pressure of 1.5 pounds per square inch or greater under actual storage conditions, unless such tank, reservoir or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is designed and equipped with one of the following vapor loss control devices, properly installed, in good working order and in operation: LIKE THE TANK SHELL CHANGED OUT, BUT NEGLECTED TO INSPECT FOR 22 MONTHS ... AND then DISCOVERED IT WAS LEAKING (for how long a time, and was the quantity of pollutants monitored(?) or included in the TRI?

560.11 A floating roof, consisting of a pontoon type or double-deck type roof, resting on the surface of the liquid contents and equipped with a closure seal, or seals, to close the space between the roof edge and tank wall. LIKE THE ONE THAN AN EMPLOYEE ACCIDENTLY LEFT UNSEALED, WHICH SPEWED VOC'S...in some unknown/unmonitored quantity, for some unknown period of time? And, you have the cajones to spin that as “good air quality”??? The control equipment provided for in this paragraph shall not be used if the gasoline or petroleum distillate has a True Vapor Pressure of 11.1 pounds per square inch or greater under actual storage conditions. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. REGULATION OF THE NORTHWEST CLEAN AIR AGENCY 5-25

560.12 A vapor recovery system, consisting of a vapor gathering system capable of collecting the hydrocarbon vapors and gases discharged and a vapor disposal system capable of processing such hydrocarbon vapors and gases so as to prevent their emission to the atmosphere and with all tank gauging devices gas-tight except when gauging or sampling is taking place. LIKE THE REST OF THE “SAFETY CONTROL SYSTEMS” THAT DON’T IN FACT PROVIDE “SAFETY,” BECAUSE WORKER ERROR OVERRIDES THE “SAFETY CONTROL SYSTEMS”? ... AND, THE AGENCY-REQUIRED “MITIGATION” FOR PROTECTING PEOPLE & ENVIRONMENT AGAINST THE RISKS OF AN [UNLAWFUL, PER ANACORTES ZONING CODE!] OIL TRANSPORTATION FACILITY ARE “Shell PSR SHALL FOLLOW SAFETY LAWS [already on the books]”?!?! Really?

560.13 Other equipment of equal efficiency, provided such equipment is submitted to and approved by the Control Officer. PASSED: February 14, 1973 AMENDED: August 8, 1978, April 14, 1993

OLD LAW:

Repealed 17.60

Hazardous/Noxious Emissions a "Prohibited Use" in HM District

- 1) Anacortes Code 17.15.020 prohibits any use that inflicts upon neighboring districts "smoke, dirt, noise, vibrations, odor, glare, or other nuisances or hazards detrimental to the health, welfare, and safety of persons occupying or visiting the district or adjacent districts."
- 2) **17.15.010 - Purpose.**
- 3) The March Point heavy manufacturing district (HM) is intended primarily for heavy manufacturing and closely related uses. To avoid unnecessary regulations on heavy manufacturing, regulations for this district are intended to provide protection principally against effects harmful to other districts. (Ord. 2614 Att. A (part), 2003) (Ord. 2794, § 1(Att. A), 12-15-2008)
- 4) Anacortes refineries—longtime violators of public safety and environmental laws—are a prohibited use according to Anacortes Municipal Code (AMC).
- 5) Refinery gas passing is legendary (the malodorous stench of volatilized petrochemicals)
- 6) Anacortes refineries are habitual violators of health and safety laws. Both are cited regularly for
 - a) Unsafe practices,
 - b) Violating terms and conditions of agency-issued *Operating Permits*, and
 - c) Illegal discharges of toxins and carcinogens into our biosphere.
- 7) Residents of the refinery fence-line community have three high-incidence cancers, which neither the City nor County will research because "It's the money"

17.15.020 - Permitted uses.

Any industrial, research and development, office, repair, warehouse, processing, shipping terminal uses, adult concessions (only located north of S. March Point Road and east of Reservation Road), commercial parking, private parking, and public parking provided that such uses are of such a nature that they do not inflict upon neighboring districts smoke, dirt, noise, vibrations, odor, glare, or other nuisances or hazards detrimental to the health, welfare, and safety of persons occupying or visiting the district or adjacent districts.

Chapter 17.60 - NONCONFORMING USES

17.15.010 - Purpose.

The March Point heavy manufacturing district (HM) is intended primarily for heavy manufacturing and closely related uses. To avoid unnecessary regulations on heavy manufacturing, regulations for this district are intended to provide protection principally against effects harmful to other districts. (Ord. 2614 Att. A (part), 2003) (Ord. 2794, § 1(Att. A), 12-15-2008)

17.60.010 - Intent.

...

- B. It is the intent of this title to permit these nonconformities to continue until they are moved, but not to encourage their survival. **Such uses are declared by this title to be incompatible with permitted uses in the district involved.** It is further the intent of this title that nonconformities shall not be enlarged upon, expanded or extended, nor be used as grounds for adding other structures or uses prohibited elsewhere in the same district.
- C. A nonconforming use of a structure, a nonconforming use of land, or a nonconforming use of a structure and land shall not be extended or enlarged after passage of any applicable ordinance by attachment on a building or premises of additional signs intended to be seen from off the premises or by the addition of other uses of a nature which would be prohibited generally in the district involved.
- D. To avoid undue hardship, nothing in this title shall be deemed to require a change in the plans, construction, or designated use of any building on which actual construction was lawfully begun, or

NEW LAW:

Changed wording...

19.49.010 Intent:

- A. To permit nonconforming uses/structures to continue until they are removed, but not to encourage their survival, except as expressly provided in this chapter, and
- B. That nonconforming uses/structures may not be used as grounds to adding other structures or uses prohibited elsewhere in the same zone, and
- C. That nonconformings uses/structures not be allowed to expand, be altered, or reconstructed, except as otherwise outlined in this chapter.

19.49.030 No nonconforming use may be permitted to be enlarged, altered, or expanded, except that a NC use may be extended throughout any part of the building which was designed for its use prior to the time of the adoption of this chapter. This extension is allowed provided that no structural alterations, except those required by law, are made there in, and that no expansion of the structure or parking requirements occurs.

Ordinance No. 2992

An Ordinance Amending Various Provisions of the Anacortes Municipal Code and Adopting a New Title 19, Unified Development Code

Whereas, the Anacortes Municipal Code currently includes development regulations and permit processing procedures in Titles 15, 16, 17, and 18;

Whereas, the City Council desires to clarify and consolidate its development regulations and permit processing procedures in a single title to provide effective and efficient rules for the public and city staff;

Whereas, on November 28, 2016, the City Council adopted Ordinance 2991 relating to new standards for stormwater management to comply with the National Pollutant Discharge Elimination System permit issued by the Washington State Department of Ecology;

Whereas, through subsequent amendments the City plans to update its development regulations to implement the Comprehensive Plan and to move Titles 15, 16, and 17 into Title 19, Unified Development Code;

Whereas, on October 19, 2016, the City provided 60-day notice of intent to adopt these development regulations to the Department of Commerce;

Whereas, on November 23 and November 30, 2016, the Planning Commission held a public hearing on the proposal;

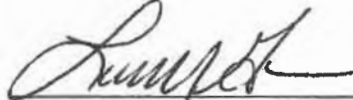
Whereas, on December 19, 2016, the City Council held a public hearing and deliberated on the proposal;

Now, therefore, the City Council of the City of Anacortes does ordain as follows:

- Section 1. The Anacortes Municipal Code is amended as shown in Attachment A.**
- Section 2. Development permit applications submitted and deemed complete prior to the effective date of this ordinance are to be processed under the procedures in effect prior to these amendments. Where a procedure in effect prior to these amendments references the Board of Adjustment, the Hearing Examiner will be utilized in its place.**
- Section 3. This ordinance takes effect five days after publication or on January 1, 2017, whichever is later.**

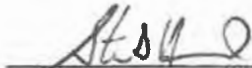
PASSED and APPROVED this 19th day of December, 2016.

CITY OF ANACORTES:



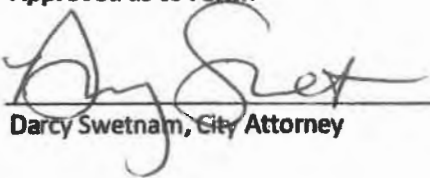
Laurie Gere, Mayor

Attest:



Steve Hoglund, City Clerk-Treasurer

Approved as to Form:



Darcy Swetnam, City Attorney

NO MODELING
FIDALGO POLLUTED w/CPAHS

Skagit County, WA: Proof State Environmental Policy Act (SEPA) is Broken

GOVERNMENT ENFORCEMENT

- * SEPA affirms people have the fundamental "right to a healthful environment."¹ Local governments enforce SEPA & safety laws.²
- * Laws prohibit noxious, hazardous uses on March Point.^{3,4} Yet, malodorous refinery chemical plumes are infamous. A recent, potentially lethal chemical plume exposed workers and residents to carcinogens and asphyxiants (two Swinomish residents were hospitalized).^{5,6,7} NWCAA received 28 odor complaints.⁸ The investigator reported her nose and lungs burned with every breath, and she left due to concern for her health.⁹ Shell was cited and fined for knowingly, intentionally disregarding safe work practices.¹⁰ PSR was "fined five times in three years for safety violations."¹¹
- Agencies do not ensure industry compliance, nor deter unsafe practices, nor stop unlawful emissions (refineries are cited regularly for such violations).^{12,13,14,15}
- * Code forbids any expansion of a *nonconforming use* in the Heavy Manufacturing District.¹⁶ Yet, Skagit County permits expansions of noxious, hazardous "High Priority Violator" refineries.¹⁷
- * SEPA requires full environmental impact analyses.¹⁸ Yet, the County ignored *reasonably foreseeable* health & safety risks (a possible oil-train catastrophe on fuel-laden March Point).^{19,20}
- Skagitonians worry about global warming, and want "strong action."²¹

HUMAN IMPACTS

SEPA protects the "health & welfare of man."²² Yet, 98221 residents have three high-incidence cancers.²³ Citizens asked public health agencies to lend expertise to the investigation, but they had no resources. Sadly, refinery workers died in "preventable" explosions.²⁵

ENVIRONMENTAL IMPACTS

SEPA compels governments to respect "environmental amenities & values."²⁵ Local residents prize a healthy environment.²⁶ Yet, Fidalgo Bay is heavily contaminated (the seafood is toxic, and Fidalgo beaches—*shorelines of statewide significance*—are contaminated with carcinogens).²⁷

ECONOMIC IMPACTS

SEPA protects ecosystems sustaining our lives and ways of life. Yet, industrial pollution & global warming harm our natural-resource economy.²⁸ Anacortes residents want good jobs in sustainable industries.²⁹ But, polluted towns are disadvantaged in the brisk competition for Clean Economy jobs.

HAZARDOUS INDUSTRY

Two refineries emit virtually all toxic air pollution in 98221,³⁰ and are among the State's worst climate polluters.³¹ PSR's CO2 emissions grew 13% in 2014.³²

Refinery expansion proposals emphasize "safety systems," but there's "no convincing evidence that safety efforts are effective."³³ Too often, "worker errors" override safety systems, exposing workers, residents, and the biosphere to dangerous levels of hazardous pollutants.³⁴

Operating Permits require "Continuous Emissions Monitoring" and reporting "at least 90%" of data, yet both refineries have violated these basic safety terms.³⁵

NWCAA's authority covers *stationary* pollution. No agency regulates carcinogenic diesel pollution (oil trains & ships).

SEPA intends for polluters to pay. Yet, industry "cost shifting" means taxpayers help fund costly cleanups (\$2.3M remediation at Shell's former tank farm).³⁶

Misinformation peppers refinery permit proposals: refinery expansions are not "a permitted use," and oil trains (even the improved model) are not "safe & environmentally sound."³⁷ They derail, catch fire, explode, and kill people.³⁸

Crude-by-rail shippers lack sufficient insurance to restore communities after catastrophic oil-train disasters. Taxpayers and municipalities foot the bills for decontamination and rebuilding.^{39,40}

asked for
Modeling of oil-train explosion - NOT

ENDNOTES

1. Department of Ecology; "SEPA Online Handbook." Retrieved 3/16/16 from: <http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch01.html>.
2. Ibid.
3. Anacortes Code prohibits any use that inflicts on people nuisances or hazards detrimental to health, safety & welfare. City of Anacortes; "Anacortes Code of Ordinances: Chapter 17.15." Retrieved 3/16/16 from: https://www.municode.com/library/wa/anacortes/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.15HEMAUSDIHM.
4. Washington's Shoreline Management Act affirms the interests of people "shall be paramount in the management of shorelines of statewide significance." Department of Ecology; "Shoreline Management Act." Retrieved 3/31/16 from: http://www.ecy.wa.gov/programs/sea/sma/st_guide/intro.html.
5. Shell's chemical plume (2/20/14) contained: hydrogen sulfide (a flammable, explosive gas); benzene & "VOC" (carcinogens); methane & ethane gas (asphyxiants), pyrophoric iron (a neurotoxin; can combust spontaneously in air, causing severe chemical burns), as well as other hazardous chemicals. Yap, Shirley; "Odor Event Emissions Estimates Letter"; Shell Oil Products US; 4/10/15. Retrieved 3/20/15 from "The Stranger": <http://www.thestranger.com/images/blogimages/2015/06/11/1434070435-april10emissumletter.pdf>
6. A willful violation (risking worker death or harm). Complaints prompted L&I to inspect Shell 11 times in three years. Department of Labor & Industries; "Anacortes Refinery Fined \$77,000 for Workplace Violations Following Toxic Release"; 11/20/15. Retrieved 3/19/16 from: <http://lni.wa.gov/News/2015/pr151120a.asp>.
7. Marczynski, Evan; "Maintenance Work at Shell Refinery Causes Bad Odors"; Skagit Valley Herald; 2/21/15. Retrieved 3/19/16 from: http://www.goskagit.com/all_access/maintenance-work-at-shell-refinery-causes-bad-odors/article_33706afa-ba3c-11e4-ad9f-77e299a04022.html.
8. NWCAA; "Board Meeting Minutes"; 3/12/15; page 4. Retrieved 4/2/16 from: nwcleanair.org/pdf/about/board/15-05_minutes.pdf.
9. Brown, Rebecca; "Draft NWCAA Investigation Report"; 3/14/15. Not online; see e-document: *Appendix A—Government Enforcement*.
10. Department of Labor & Industries, op cit, "Anacortes Refinery Fined \$77,000."
11. Ryan, John; "Safety Problems Old & New at Anacortes Oil Refineries"; KUOW; 4-5-13. Retrieved 3/19/16 from: <http://kuow.org/post/safety-problems-old-and-new-anacortes-oil-refineries>.
12. Both refineries are longtime "High Priority Violators," and regularly violate health, safety & environmental laws and *Operating Permit* terms & conditions. Robert McClure, et al; "EPA's 'High Priority Violators' Scattered Across the Northwest," Oregon Public Broadcasting; 11-7-11. Retrieved 3/19/16 from: <http://www.opb.org/news/article/epas-high-priority-violators-scattered-across-the/>.
13. "A single [oil tanker] idling at port can produce as much [carcinogenic] diesel pollution as 2,300 semi-trucks driving down the highway." Cornwall, Warren & Justin Mayo; "Where the Worst Air Is"; Seattle Times; February 23, 2006. Retrieved 3/19/16 from: <http://community.seattletimes.nwsources.com/archive/?date=20060223&slug=toxic23m>.
14. Woodruff, Jan; "Case Summaries—NWCAA Refinery 'Notice of Violations' Reports"; 10-22-15. Not online; see e-document, *Appendix A—Government Enforcement*.
15. Northwest Clean Air Agency; "Notice of Violation Reports: 1/1/10 to 5/22/15." Not online; see e-document, *Appendix A—Government Enforcement*.
16. A nonconforming use cannot expand, or add new uses/structures. City of Anacortes, op cit, "Code."
17. Skagit County failed to follow SEPA in permitting Tesoro—a nonconforming use—to add a hazardous rail transportation facility (an *invalid permit*—issued in violation of law—is revocable).
18. Department of Ecology, op cit, "SEPA Online Handbook."
19. Skagit failed to evaluate *reasonably foreseeable* direct, indirect & cumulative adverse impacts in rail proposals, such as carcinogenic diesel emissions—and oil spills—along the rail route, or locomotive diesel exhaust from oil trains unloading 24/7 on March Point.
20. Skagit County Emergency Management "doesn't have the resources" to model potential blast and evacuation zones on March Point, a Heavy Industrial District loaded with fuel-and-chemical-filled plants, equipment, pipelines & storage tanks. Anderson, Mark; Telephone conversation (2/16).
21. Yale University Program for Climate Change Communications & Skagit Climate Science Consortium; "Global Warming: Knowledge & Attitudes in Skagit County, Washington: Key Findings"; 2015. Retrieved 3/19/16, from: http://www.skagitclimatescience.org/wp-content/uploads/2015/12/Final_SkagitPollingWebPDF.11_22_2015.pdf.
22. Department of Ecology, op cit, "SEPA Online Handbook."
23. Residents of the 98221 industrial fence-line community have three high-incidence cancers: melanoma of the skin (82% higher—age adjusted—that WA); bladder cancer (38% higher), and prostate cancer (32% higher). Neither DOH nor Skagit County Public Health have the resources to investigate 98221 cancers (or children's health status). CEHA Taskforce; "Community Environmental Health Assessment: Washington State Cancer Registry Analysis of 98221 Residents"; June 2015. Not online, see e-document, *Appendix B—Human Impacts*.
24. Federal officials concluded the preventable disaster was caused by Tesoro's "deficient refinery safety culture," and failure to "apply inherently safer technology." "CSB Investigation Finds 2010 Tesoro Refinery Fatal Explosion Resulted from High Temperature Hydrogen Attack Damage to Heat Exchanger"; 1-29-14. Retrieved 3/19/16 from: <http://www.csb.gov/csb-investigation-finds-2010-tesoro-refinery-fatal-explosion-resulted-from-high-temperature-hydrogen-attack-damage-to-heat-exchanger/>.
25. Department of Ecology, op cit, "SEPA Online Handbook."
26. City of Anacortes; "Draft 2016 Comprehensive Plan"; 3-2-16. Retrieved 3/19/16 from: http://www.cityofanacortes.org/docs/Planning/2016CompPlan/Exhibit_List/115-PC-Recommended-2016-CompPlan.pdf.
27. DOH issued "seafood consumption" and "beach play" warnings, because Fidalgo Bay seafood is toxic, and beaches are contaminated with carcinogenic polycyclic aromatic hydrocarbons (cPAHs). "Health Consultation: Fidalgo Bay"; Washington DOH & Agency for Toxic Substances & Disease Registry; 2-15-10. Retrieved 3/19/16 from: <http://www.atsdr.cdc.gov/HAC/pha/FidalgoBay/FidalgoBayHC02252010.pdf>.
28. As global CO₂ rises, so does the ocean's temperature & acidity, "altering food webs, and negatively affecting economies dependent on [ecosystem] services ranging from coral reef tourism to shellfish harvests to salmon fisheries." Kelly, RP et al; "Mitigating Local Causes of Ocean Acidification with Existing Laws"; Science; 5/27/11. Retrieved 4/2/16 from: <http://westcoastsoh.org/wp-content/uploads/2013/12/OA-Science-2011-Kelly-1036-7-1.pdf>.
29. City of Anacortes, op cit, "Draft 2016 Comprehensive Plan."
30. "At a combined 377,400 pounds of toxic waste annually," Anacortes' "High Priority Violators" produce virtually all hazardous pollution in 98221. CEHA Task Force, op cit., page 6.
31. Ryan, John; "These are Washington's Top 10 Climate Polluters"; KUOW; (1/29/16). Retrieved 3/19/16 from: <http://kuow.org/post/these-are-washingtons-top-10-climate-polluters>.
32. Dufford, Wlick; "Hearing Examiner's Decision"; 2-23-15. Retrieved 3/19/16 from: <http://skagitcounty.net/PlanningAndPermit/Documents/ShellPermit/02-23-15%20Hearing%20Examiner%20Decision.pdf>.
33. NWCAA; "2014 Emissions Inventory"; Retrieved 4/2/16, from: http://www.nwcleanair.org/airQuality/documents/EmissionsInventory2014_000.pdf
34. Jan Woodruff; op cit, "NOV Case Summaries."
35. Ibid.
36. The recent site remediation was required to reduce human health hazards still present today from 30-year-old storage tank leaks. Today's March Point tank leaks are tomorrow's taxpayer liability. "Port awards contract for cleanup at former Shell tank farm site"; Anacortes American; 9/10/14. Retrieved 3/21/16 from: http://www.goanacortes.com/news/article_3f932d8-3875-11e4-8d8d-001a4bc887a.html
37. McAllister, Edward; "Derailed CSX train in West Virginia hauled newer-model tank cars"; Reuters; 2-17-15. Retrieved 3/19/16 from: <http://www.reuters.com/article/us-usa-train-derailment-csx-idUSKBNOLK15T20150217>.
38. An oil train derailment, explosion & fire in a small Quebec town [population 5900] killed 47 people & flattened 30 buildings within the one kilometer (0.6 mi) blast zone. City of Anacortes; "Resolution No. 1889"; 7-21-14. In Retrieved 3-2-16 from: http://www.cityofanacortes.org/document_center/Resolutions/2010-2019/Res1889.pdf.
39. "The total cost for rebuilding Lac-Mégantic may be around \$2.7 billion over the next decade, and cleaning up contamination "will add another \$200 million to the price tag of the disaster." Foster, Joanna M.; "Spring Brings New Environmental Worries For Weary Lac-Mégantic"; Climate Progress; 4/17/14. Retrieved 4/2/16 from: <http://thinkprogress.org/climate/2014/04/17/3427767/crude-oil-resurfaces-lac-megantic/>.
40. Ramel, Alex; "Oil Train Insurance: Washington State and the Billion Dollar Disaster"; Stand.earth. Retrieved 4/2/16, from: <http://www.stand.earth/blog/oil-train-insurance-washington-state-and-billion-dollar-disaster>.



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Tesoro Refining & Marketing Company LLC" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
6/11/2010	3/17/2010	3842	N	N	Tesoro Refining & Marketing Company LLC 10200 West March Point Rd. Anacortes, WA 98221 Cited Regulations: WAC 173-400-040 (6): No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes, except: When the owner or operator of an emissions unit supplies emission data and can demonstrate to ecology or the authority that there is no feasible method of reducing the concentration to less than one thousand ppm (on a dry basis, corrected to seven percent oxygen for combustion sources) and that the state and federal ambient air quality standards for sulfur dioxide will not be exceeded. In such cases, ecology or the authority may require specific ambient air monitoring stations be established, operated, and maintained by the owner or operator at mutually approved locations. All sampling results will be made available upon request and a monthly summary will be submitt Description: On March 17, 2010, The Tesoro Refinery experienced a sudden shutdown of three boilers, which resulted in process unit upsets and flaring. The steam shortage also caused visible emissions in excess of 20% opacity from the three refinery flares for a total of 142 minutes over 4 1-hour periods between 1:00 pm and 5:00 pm [AOP 013R1 Term 4.4 - NWCAA Reg 451.1 and Term 5.9.10 - 40 CFR 60.18(c)(1)]. The visible emissions from the flares consisted of soot particles. Particulate emissions during the event were estimated to be 5,500 lbs. Refinery process streams containing sulfur, diverted to the flare system caused emissions in excess of 1000 ppm SO2 over 14 1-hour periods from 3/17/10 7:00 pm to 3/18/10 9:00 am resulting in excess emissions of 536 lb of SO2 [AOP 013R1 Term 4.11 - WAC 173-400-040(6)].	7/15/2010	\$3,000	\$0
3/12/2014	9/4/2012	4074	N	N	Tesoro Refining & Marketing Company LLC 10200 West March Point Rd. Anacortes, WA 98221	10/28/2014	\$75,000	\$0

Printed: May 22, 2015

EMISSIONS DETRIMENTAL TO PERSONS OR PROPERTY. NO PERSON SHALL CAUSE OR ALLOW THE EMISSIONS OF ANY AIR CONTAINMENT FROM ANY SOURCE IF IT IS DETRIMENTAL TO THE HEALTH, SAFETY, OR WELFARE OF ANY PERSON OR CAUSES DAMAGE



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Tesoro Refining & Marketing Company LLC" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: 40 CFR 60.7(c): Each owner or operator required to install a continuous monitoring system (CMS) or monitoring device shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and/or summary report form (see paragraph (d) of this section) to the Administrator semi-annually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. (2/12/99) Section 300.1: A Notice of Construction and/or PSD permit application must be filed by the owner or operator and an Order of Approval and/or PSD permit issued by the NWCAA, or other designated permitting agency, prior to the establishment of any new source, except for: a) Those stationary sources exempt under N Description: Tesoro modified heater F-101 by replacing the burner tips in August 2011. Source testing conducted on January 10, 2012 measured emissions from F-101 at 0.045 lb NOX/MMBtu and 45.3 ppm NOX @ 0% O2. Source testing conducted on March 28, 2012 measured emissions from F-101 at 0.043 lb NOX/MMBtu and 41.9 ppm NOX @0% O2. When compared to testing conducted prior to the burner tip replacement project, these results demonstrate an increase in the unit emission rate in accordance with 60.14 (b)(2). This modification of the heater triggered applicability of 40 CFR Part 60 Subpart Ja in accordance with 60.100a. The triggering of 40 CFR Part 60 Subpart Ja applicability also triggers NWCAA permit action in accordance with AOP 0013R1 (1/26/10) Conditions 2.8.1.1 and 2.8.1.2.			
2/5/2015	6/1/2013	4129	N	N	Tesoro Refining & Marketing Company LLC 10200 West March Point Rd. Anacortes, WA 98221	4/9/2015	\$12,000	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Tesoro Refining & Marketing Company LLC" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					<p>Cited Regulations: Section 462.1: It shall be unlawful for any person to cause or permit the emission of air contaminants from any equipment if the air contaminants emitted as measured in the stack contain sulfur compounds calculated as sulfur dioxide, of more than one thousand (1,000) parts per million (2.62 mg/m3), averaged for a sixty consecutive minute period, except as otherwise provided by a specific emission restriction adopted by the NWCAA and/or the DOE. For the purpose of this section, all sulfur present in gaseous compounds containing oxygen shall be deemed present as sulfur dioxide. WAC 173-400-040(7): No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes, except:</p> <p>When the owner or operator of an emissions unit supplies emission data and can demonst</p> <p>Description: On October 1, 2013 a series of electrical failures, including improper fusing, resulted in shutdown of the catalytic cracking unit (CCU) and diversion of the sour water stripper gas to the facility flare. Emissions from the flare exceeded 1,000 ppmdv SO2 (corrected to 7% O2) for 8 1-hour periods resulting in approximately 4,300 lbs of excess SO2 emissions (AOP 013R1 Conditions 4.10 and 4.11).</p>			

Total: \$182,000 \$0

#of NOV's: 5

of Warnings: 0

of HPV's: 1



NOTICE OF VIOLATION REPORT

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
2/16/2010	5/22/2008	3791b	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: AOP Term 2.1.10.2 (12/1/05): NWCAA 367 and Appendix A All CEMs shall be operated in accordance with the appropriate section of 40 CFR Part 60 Appendix F, and the operator shall assess the operation of each CEM daily. All gaseous CEMs shall be maintained using the QA criteria of 40 CFR Part 60 Appendix F and the manufacturer's procedures. ... CEMs are required to maintain greater than 90% data availability on a monthly basis. A supplemental report shall be submitted if during any calendar month a CEM fails to produce 90% data availability stating the reasons for the low data availability. AOP Term 5.20 (12/1/05): NSPS Subpart GG 40 CFR 60.334 (b) and (j)(1)(iii) 40 CFR 60.334(b) references 40 CFR 60.13(e): Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under paragraph (d) of this section, all continuous monitoring systems shall be in continuous opeartion and shall meet minimum frequency of operation requirements as follows: Description: Data avallability of the Unit 2 SO2 CEM and the Unit 3 NH3 CEM in April 2008, the Unit 1 SO2 CEM in July 2008, and the Unit 2 CO CEM in December 2008 were reported to be less than the required 90%. Revision a: 10/13/09. Removed references to report format. Specified which CEMs were in violation during each month cited. Revision b: 2/15/10. Violation reissued to Puget Sound Refinery. NWCAA received transfer of ownership notification 2/4/10.	3/18/2010	\$20,000	\$0
4/10/2012	3/6/2010	3949	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	9/11/2012	\$50,000	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: Section 462.1: It shall be unlawful for any person to cause or permit the emission of air contaminants from any equipment if the air contaminants emitted as measured in the stack contain sulfur compounds calculated as sulfur dioxide, of more than one thousand (1,000) parts per million (2.62 mg/m3), averaged for a sixty consecutive minute period, except as otherwise provided by a specific emission restriction adopted by the NWCAA and/or the DOE. For the purpose of this section, all sulfur present in gaseous compounds containing oxygen shall be deemed present as sulfur dioxide. WAC 173-400-040(6): No person shall cause or allow the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. Description: On July 20, 2010 and October 15, 2010, emissions from the Shell Puget Sound Refinery East Flare exceeded 1,000 ppm SO2 corrected to 7% oxygen, 60-consecutive-minute average (AOP 005R1 Terms 4.10 and 4.11). The excess emissions were a result of a failure to properly manage Delayed Coker Unit (DCU) blowdown gas while the DCU blowdown recovery compressor was inoperative.			
4/7/2011	12/26/2010	3897	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: AOP 005R1 5.39: NOX emissions shall not exceed: When burning all gaseous fuel combinations except 100% natural gas, Avjet or low sulfur distillate fuel and combinations of butanes and propanes: 9 ppmvd @ 15% O2 calendar day average. Description: Shell Puget Sound Refinery caused or allowed NOX emissions at Cogen 3 in excess of the applicable limit in AOP 005R1 Condition 5.39. The excess emissions were a result of a failure to follow procedures returning the CEMS to normal operation after being placed in "maintenance mode" for maintenance. The prolonged CEMS maintenance mode setting inhibited operation of the ammonia injection control system, allowing NOX emissions to exceed the maximum allowable daily average concentration for 12 consecutive days (December 15 through 26, 2010).	5/27/2011	\$25,000	\$0
4/17/2012	3/7/2011	3950	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	7/25/2012	\$6,000	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					<p>Cited Regulations: 40 CFR 60.104(a)(2)(i): NSPS Subpart J - (a) No owner or operator subject to the provisions of this subpart shall:(2) Discharge or cause the discharge of any gases into the atmosphere from any Claus Sulfur Recovery plant containing in excess of (i) For an oxidation control system or a reduction control system followed by incineration, 250 ppm by volume (dry basis) of SO₂ at zero percent excess air (6/24/08). NWCAA Regulation Section 300.15: It shall be unlawful for an owner or operator of a source or emission unit to not abide by the operating and reporting conditions in an Order of Approval. 40 CFR 63.1568(a)(1): NESHAP Subpart UUU - Sulfur Recovery Units You must:(1) Meet each emission limitation in Table 29: 250 ppmv (dry basis) of sulfur dioxide (SO₂) at zero percent excess air if you use an oxidation or reduction control system followed by incineration. If your sulfur recovery unit is subject to the NSPS for sulfur oxides in §60.104 of this chapter, you must meet the emission</p> <p>Description: On May 10, 2011, emissions from the Shell Puget Sound Refinery Sulfur Recovery Unit (SRU) 3 exceeded 250 ppmvd SO₂ corrected to 0% oxygen, 12-hour average (AOP 014M1 Terms 5.8.15 and 5.8.19, and OAC 828a Condition 3). The excess emissions were a result of an inadvertent trip of the unit during testing of the protective shutdown systems (i.e., fire-eye testing).</p>			



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Description: On August 15, 2011, emissions from the Shell Puget Sound Refinery Sulfur Recovery Unit (SRU) 3 exceeded 250 ppmvd SO2 corrected to 0% oxygen, 12-hour average (AOP 014M1 Terms 5.8.15 and 5.8.19 and OAC 828 Condition 3). The excess emissions were a result of the programmable logic controller (PLC) not being sequenced correctly during startup causing excess oxygen in the reactor resulting in high bed temperatures causing the Tail Gas Treatment Unit 1 (TGTU1) to trip.			
12/20/2011	12/9/2011	3941	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Section 535.1: Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gasses emitted into the atmosphere to a reasonable minimum. Section 535.3: Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practices and control equipment to reduce these odors to a reasonable minimum. Section 535.4: Odor emissions detrimental to persons or property. No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. AOP 4.17: WAC 173-400-040(4); Odor. Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice Description: Release of odorous substances from the wastewater treatment plant in such concentrations and of such duration as to be detrimental to the health, safety, or welfare of a person, cause damage to property or business, or unreasonably interfere with any other property owner's use and enjoyment of his or her property. Appropriate and recognized good practices, procedures, and control equipment shall be used, installed, and operated to reduce odor-bearing gases emitted into the atmosphere to a reasonable minimum. Odor nuisance documented at the complainant's residence in the 14000 block of Ashley Place, Anacortes, WA.	2/8/2012	\$7,000	\$0



NOTICE OF VIOLATION REPORT

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: Section 535.1: Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gasses emitted into the atmosphere to a reasonable minimum. Section 535.3: Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practices and control equipment to reduce these odors to a reasonable minimum. Section 535.4: Odor emissions detrimental to persons or property. No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. WAC 173-400-040(5): Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice and Description: Release of odorous substances in such concentrations and of such duration as be detrimental to he health, safety, or welfare of a person, cause damage to property or business, or unreasonably interfere with any other property owner's use and enjoyment of his or her property. This is a violation of AOP Terms 4.17 & 4.19. Odor nuisance impacts documented at the complainant's residence in the 8200 block of State Route 20 in Anacortes.			
10/3/2012	10/2/2012	3987	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	11/21/2012	\$9,000	\$0



NOTICE OF VIOLATION REPORT

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: Section 535.1: Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gasses emitted into the atmosphere to a reasonable minimum. Section 535.3: Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practices and control equipment to reduce these odors to a reasonable minimum. Section 535.4: Odor emissions detrimental to persons or property. No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. WAC 173-400-040(5): Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice and Description: Release of odorous substances in such concentrations and of such duration as to be detrimental to the health, safety, or welfare of a person, cause damage to property or business, or unreasonably interfere with any other property owner's use and enjoyment of his or her property. This is a violation of AOP Terms 4.17 & 4.19. Odor nuisance impacts were documented at the complainant's residence in the 1300 block of N Avenue, Anacortes.			
10/22/2012	10/18/2012	3997	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	11/28/2012	\$10,000	\$0



NOTICE OF VIOLATION REPORT

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: Section 535.1: Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gasses emitted into the atmosphere to a reasonable minimum. Section 535.3: Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practices and control equipment to reduce these odors to a reasonable minimum. Section 535.4: Odor emissions detrimental to persons or property. No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. WAC 173-400-040(5): Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice and Description: Release of odorous substances in such concentrations and of such duration as to be detrimental to the health, safety, or welfare of a person, cause damage to property or business, or unreasonably interfere with any other property owner's use and enjoyment of his or her property. This is a violation of AOP Terms 4.17 & 4.19. Odor nuisance impacts were documented at the complainant's residence in the 1100 block of 20th Street, Anacortes.			
3/20/2014	5/13/2013	4078	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	5/30/2014	\$16,000	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: 40 CFR 60.104(a)(2)(i): NSPS Subpart J - (a) No owner or operator subject to the provisions of this subpart shall:(2) Discharge or cause the discharge of any gases into the atmosphere from any Claus Sulfur Recovery plant containing in excess of (i) For an oxidation control system or a reduction control system followed by incineration, 250 ppm by volume (dry basis) of SO ₂ at zero percent excess air (6/24/08). NWCAA Regulation Section 300.15: It shall be unlawful for an owner or operator of a source or emission unit to not abide by the operating and reporting conditions in an Order of Approval. 40 CFR 63.1568(a)(1): NESHAP Subpart UUU - Sulfur Recovery Units You must:(1) Meet each emission limitation in Table 29: 250 ppmv (dry basis) of sulfur dioxide (SO ₂) at zero percent excess air if you use an oxidation or reduction control system followed by incineration. If your sulfur recovery unit is subject to the NSPS for sulfur oxides in §60.104 of this chapter, you must meet the emission Description: On June 7, 2013, emissions from the Shell Puget Sound Refinery Sulfur Recovery Unit (SRU) 3 exceeded 250 ppmvd SO ₂ corrected to 0% oxygen, 12-hour rolling average (AOP 014M1 Terms 5.8.15 and 5.8.19 and OAC 828 Condition 3). Also, the sulfur content of the gas combusted at the flare exceeded 162 ppmv H ₂ S, 3-hour average (40 CFR 60.103a(h)). Total excess emissions from this event were estimated to be 846 lbs SO ₂ . The excess emissions were a result of inadvertently shutting down SRU4 instead of SRU3 during a process upset.			
8/28/2014	7/11/2013	4102	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: 40 CFR 63.6600(d): If you own or operate an existing non-emergency stationary CI RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the emission limitations in Table 2c to this subpart and the operating limitations in Table 2b to this subpart which apply to you (3/10/2010). 40 CFR 63 63.6600 Table 2c-5: 5. Non-Emergency, non-black start stationary CI RICE >500 HP a. Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd or less at 15 percent O ₂ ; or b. Reduce CO emissions by 70 percent or more (3/06/2013).	11/5/2014	\$4,000	\$0



NOTICE OF VIOLATION REPORT

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					<p>Cited Regulations: Section 462.1: It shall be unlawful for any person to cause or permit the emission of air contaminants from any equipment if the air contaminants emitted as measured in the stack contain sulfur compounds calculated as sulfur dioxide, of more than one thousand (1,000) parts per million (2.62 mg/m³), averaged for a sixty consecutive minute period, except as otherwise provided by a specific emission restriction adopted by the NWCAA and/or the DOE. For the purpose of this section, all sulfur present in gaseous compounds containing oxygen shall be deemed present as sulfur dioxide. WAC 173-400-040(7): No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes, except:</p> <p>When the owner or operator of an emissions unit supplies emission data and can demonst</p> <p>Description: On 2/6/14, emissions from the Shell Puget Sound Refinery flare exceeded 1,000 ppmvd SO₂ corrected to 7% oxygen, 60-minute average (AOP 014M1 9/24/04; terms 4.10 and 4.11) and the flare gas sulfur content exceeded 162 ppmvd H₂S, 3-hour rolling average. Gas turbine generator 2 also exceeded the 1-hour average CO limit (AOP 005R1 12/1/05; term 5.9). Total excess emissions were 3,145 lb SO₂ and 1 lb of CO. The excess emissions were a result of equipment failures in freezing conditions.</p>			
7/22/2014	3/4/2014	4081	N	N	<p>Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221</p>	11/5/2014	\$21,000	\$0



NOTICE OF VIOLATION REPORT

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-2010 AND May-22-2015

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: 40 CFR 63.646(a): Each owner or operator of a Group 1 storage vessel subject to this subpart shall comply with the requirements of § 63.119 through 63.121 except as provided in paragraphs (b) through (l) of this section. 40 CFR 63.119(b)(1): (b) The owner or operator who elects to use a fixed roof and an internal floating roof, as defined in §63.111 of this subpart, to comply with the requirements of paragraph (a)(1) of this section shall comply with the requirements specified in paragraphs (b)(1) through (b)(6) of this section. (1) The internal floating roof shall be floating on the liquid surface at all times except when the floating roof must be supported by the leg supports during the periods specified in paragraphs (b)(1)(i) through (b)(1)(iii) of this section. Description: The internal floating roof of Tank 30 landed its legs and was no longer floating for a period of eight hours on April 6, 2014. The roof legs were inadvertently left in the extended down position while the tank was in normal operation storing heavy platformate. The incident resulted in an estimated 398 pounds of excess volatile organic compounds (VOC) being released to the atmosphere.			
7/10/2014	4/30/2014	4097	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: 40 CFR 60.103a (h): Each owner or operator shall not burn in any affected flare any fuel gas that contains H ₂ S in excess of 162 ppmv determined hourly on a 3-hour rolling average basis. The combustion in a flare of process upset gases or fuel gas that is released to the flare as a result of relief valve leakage or other emergency malfunctions is exempt from this limit. (9/12/12)	1/5/2015	\$4,000	\$0

OLD LAW:

Hazardous/Noxious Emissions a “Prohibited Use” in HM District

- 1) Anacortes Code 17.15.020 prohibits any use that inflicts upon neighboring districts “smoke, dirt, noise, vibrations, odor, glare, or other nuisances or hazards detrimental to the health, welfare, and safety of persons occupying or visiting the district or adjacent districts.”
- 2) **17.15.010 - Purpose.**
- 3) The March Point heavy manufacturing district (HM) is intended primarily for heavy manufacturing and closely related uses. To avoid unnecessary regulations on heavy manufacturing, regulations for this district are intended to provide protection principally against effects harmful to other districts. (Ord. 2614 Att. A (part), 2003) (Ord. 2794, § 1(Att. A), 12-15-2008)
- 4) Anacortes refineries—longtime violators of public safety and environmental laws—are a prohibited use according to Anacortes Municipal Code (AMC).
- 5) Refinery gas passing is legendary (the malodorous stench of volatilized petrochemicals)
- 6) Anacortes refineries are habitual violators of health and safety laws. Both are cited regularly for
 - a) Unsafe practices,
 - b) Violating terms and conditions of agency-issued *Operating Permits*, and
 - c) Illegal discharges of toxins and carcinogens into our biosphere.
- 7) Residents of the refinery fence-line community have three high-incidence cancers, which neither the City nor County will research because “It’s the money”

17.15.020 - Permitted uses.

Any industrial, research and development, office, repair, warehouse, processing, shipping terminal uses, adult concessions (only located north of S. March Point Road and east of Reservation Road), commercial parking, private parking, and public parking provided that such uses are of such a nature that they do not inflict upon neighboring districts smoke, dirt, noise, vibrations, odor, glare, or other nuisances or hazards detrimental to the health, welfare, and safety of persons occupying or visiting the district or adjacent districts.

Chapter 17.60 - NONCONFORMING USES

17.15.010 - Purpose.

The March Point heavy manufacturing district (HM) is intended primarily for heavy manufacturing and closely related uses. To avoid unnecessary regulations on heavy manufacturing, regulations for this district are intended to provide protection principally against effects harmful to other districts. (Ord. 2614 Att. A (part), 2003) (Ord. 2794, § 1(Att. A), 12-15-2008)

17.60.010 - Intent.

...

- B. It is the intent of this title to permit these nonconformities to continue until they are moved, but not to encourage their survival. **Such uses are declared by this title to be incompatible with permitted uses in the district involved.** It is further the intent of this title that nonconformities shall not be enlarged upon, expanded or extended, nor be used as grounds for adding other structures or uses prohibited elsewhere in the same district.
- C. A nonconforming use of a structure, a nonconforming use of land, or a nonconforming use of a structure and land shall not be extended or enlarged after passage of any applicable ordinance by attachment on a building or premises of additional signs intended to be seen from off the premises or by the addition of other uses of a nature which would be prohibited generally in the district involved.
- D. To avoid undue hardship, nothing in this title shall be deemed to require a change in the plans, construction, or designated use of any building on which actual construction was lawfully begun, or

NEW LAW:

Changed wording...

19.49.010 Intent:

- A. To permit nonconforming uses/structures to continue until they are removed, but not to encourage their survival, except as expressly provided in this chapter, and
- B. That nonconforming uses/structures may not be used as grounds to adding other structures or uses prohibited elsewhere in the same zone, and
- C. That nonconformings uses/structures not be allowed to expand, be altered, or reconstructed, except as otherwise outlined in this chapter.

19.49.030 No nonconforming use may be permitted to be enlarged, altered, or expanded, except that a NC use may be extended throughout any part of the building which was designed for its use prior to the time of the adoption of this chapter. This extension is allowed provided that no structural alterations, except those required by law, are made there in, and that no expansion of the structure or parking requirements occurs.

10/20/2015

email between woodruff & Measamer re AMC 17.15

woodruff2000@yahoo.com - Yahoo Mail

REPEALED LAW

Home Mail Search News Sports Finance Weather Games Answers Screen Flickr Mobile Try Momo Mail on Firefox

Q All Search

Search Mail

Search Web



Home



jan



Compose

Delete Move More



People

Inbox

Drafts (370)

Sent

Spam

Trash (11)

Smart Views

Important

Unread

Starred

People

Social

Travel

Shopping

Finance

Folders (5)

CEHA (1)

Gary

Gary Finance

Heather floor

Heather Mats_Labor_Q...

HSA-Wa Heal... (1)

Notes

PDXvsSHELL (1)

POL_Shell (2)

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Fw: Zoning Question re March Point

Don Measamer
City of Anacortes
Department of Planning, Community & Economic
Development

From: Jan Woodruff [mailto:woodruff2000@yahoo.com]
Subject: Re: Zoning Question re March Point

Hi Don:

Thanks for the quick answer. Unfortunately, I'm still uncertain about the details. May I stop by with my notes to discuss further with you?

Let me take a stab at this via email:

- Per Interlocal Agreement, County has adopted Anacortes zoning for the unincorporated Anacortes HM District.
- AMC 17.15 says a use that inflicts nuisances (odor, smoke, etc) and hazards on people in the HM District and in adjacent districts is an incompatible/nonconforming use.
- AMC code for Nonconforming Uses says that if a use that was once conforming, but now is prohibited, it shall not be permitted to expand/enlarge or add structures or uses (not to make the situation any worse than it already is)

So, here's a scoping issue for the Shell EIS that I'm developing (based on my knowledge of refinery operations from three years of research about our community's high cancer rates, and my very limited understanding of zoning law):

- The refineries have not complied for decades with the Clean Air Act (as well as other environmental and public safety laws), and regularly, illegally discharge toxins and carcinogens into our fence-line community (the 98221 zip code).
- The horrific refinery odors on Highway 20 are an incompatible activity in HMD, per AMC 17.15
- The recent toxic plume that harmed La Conner residents is further evidence that refineries are an incompatible use per AMC 17.15
- Given that the refineries engage in prohibited uses, AMC's Nonconforming Uses applies ...
- Hence, Skagit County cannot approve any additional structures or uses for PSR.

Is my understanding/interpretation of the code correct (if I have facts proving PSR inflicts nuisances and hazards on people in adjacent districts)?

If this is too difficult/detailed to answer via email, may I stop by later today (or tomorrow) to chat?

Best regards,

Jan Woodruff

by Max Ma on flickr

https://us-mg4.mail.yahoo.com/neo/launch?.rand=08gbjn9j6a00i#2407256077

NOW REPEALED!!!

Dash And Albert
Herringbone

\$33

Shop now

Company C
Sheffield Stripe

\$545

Shop now

Dash And Albert
Fair Isle 72657

\$37

Shop now

Calvin Klein CK22
Naturals NT05

\$165

Shop now

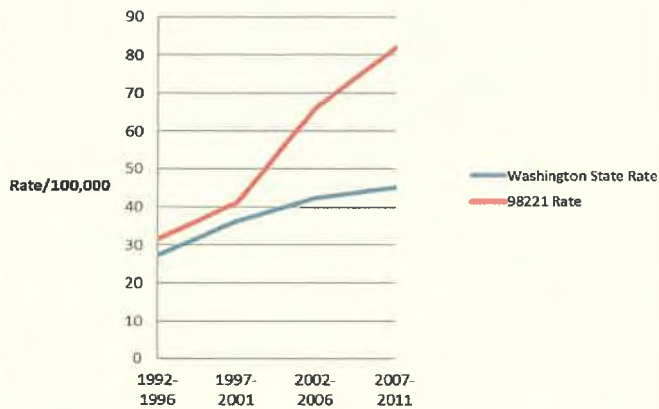
Skagit asked:

Ryan said
"permitted use"

Agencies ensure
Compliance
Public Records
Request

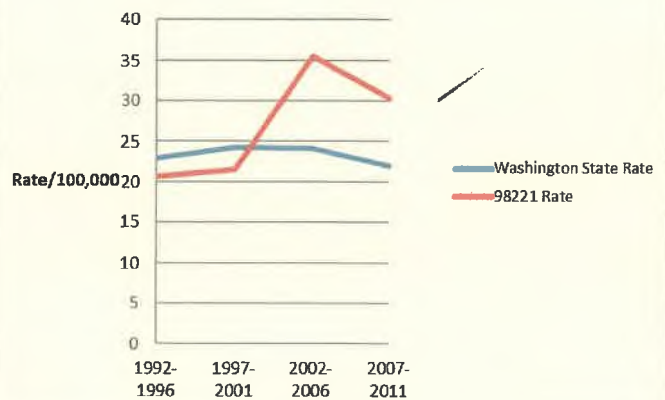
strangle hold -
lost opp'ty

Melanoma Skin Cancer, 98221 vs. State



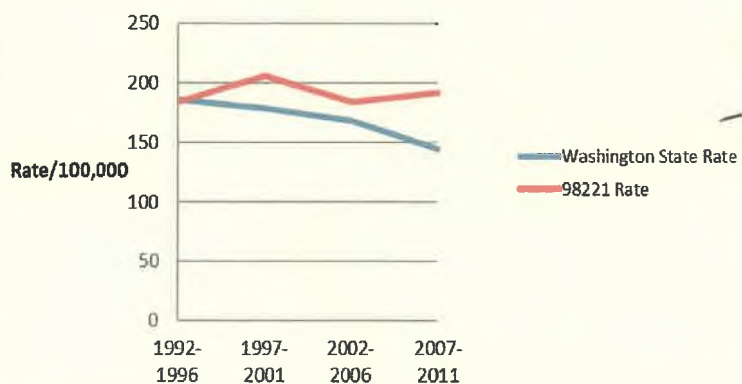
82% higher than avg Washington

Bladder Cancer Rate, 98221 vs State



38% higher than the average Washington

Prostate Cancer Rates, 98221 vs. State



32% higher > WA

ABSTRACT

COMMUNITY ENVIRONMENTAL HEALTH ASSESSMENT: WASHINGTON STATE CANCER REGISTRY ANALYSIS OF 98221 RESIDENTS

June 2015

Community Environmental Health Assessment Task Force (CEHA),
Anacortes, WA

Following the release of a Department of Health (DOH) report showing Skagit County residents had the highest bladder cancer rate (and third-highest cancer rate overall) in Washington State, the Community Environmental Health Assessment (CEHA) Task Force embarked on a two-year study of cancer in its industrial fence-line community: the 98221 zip code.

At CEHA's request, the Washington State Cancer Registry (WSCR, DOH) analyzed 98221 residents' cancer rates. WSCR data revealed that, compared to Washingtonians, 98221 residents had significantly higher age-adjusted rates of three cancer types: melanoma skin cancer (82% higher than the State's rate); bladder cancer (38% higher than the State's rate); and prostate cancer (32% higher than the State's rate).

This Salish Sea community, home to a marine port and the March Point Heavy Manufacturing District, is no stranger to toxic contamination or environmental remediation. The DOH *Health Consultation for Fidalgo Bay* (2010) found toxic and carcinogenic contamination in Bay seafood and beach sediment. Concerns about Fidalgo Bay toxicants and carcinogens resulted in the DOH issuing multiple public safety warnings about seafood consumption (for both tribes and the wider public) as well as "beach play" (contact with carcinogenic polycyclic aromatic hydrocarbons in beach sediment). Eating seafood at tribal consumption rates from this *usual and accustomed fishing tribal rights area* is "expected to harm children and adults" and constitutes a "public health hazard."

Public records reveal that 90% of all hazardous pollution discharged into the 98221 biosphere comes from two petroleum refineries (U.S. EPA *High Priority Violators*) that routinely violate the Federal and State Clean Air Acts (e.g., failing to monitor, manage, treat or properly control benzene streams and emissions). Considering 98221 residents' high bladder cancer rates against this backdrop of ecosystem degradation and illegal industrial pollution raises many concerns.

**COMMUNITY ENVIRONMENTAL HEALTH ASSESSMENT: WASHINGTON
STATE CANCER REGISTRY ANALYSIS OF 98221 RESIDENTS**

Jan Woodruff
WSCR Research Team Leader,
Community Environmental Health Assessment Task Force

Corpus Uteri		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	25	24.3	25.7	4,753	16,631,605
2007-2011	98221 Zip Code (eight 2010 census tracts)	22.5	13.5	38.1	22	59,754
2002-2006	State excluding 98221	24.4	23.6	25.2	4,030	15,544,989
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	56,770
1997-2001	State excluding 98221	26.3	25.4	27.1	3,816	14,558,638
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	53,991
1992-1996	State excluding 98221	26.9	26.1	27.9	3,495	13,429,132
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	49,653

Ovary		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	13.3	12.8	13.8	2,460	16,631,605
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	59,754
2002-2006	State excluding 98221	14.7	14.1	15.3	2,410	15,544,989
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	56,770
1997-2001	State excluding 98221	16.2	15.6	16.9	2,371	14,558,638
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	53,991
1992-1996	State excluding 98221	15.9	15.2	16.6	2,084	13,429,132
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	49,653

Vulva		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	8.1	7.7	8.5	1,459	16,631,605
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	59,754
2002-2006	State excluding 98221	7.8	7.4	8.3	1,278	15,544,989
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	56,770
1997-2001	State excluding 98221	7.4	6.9	7.8	1,087	14,558,638
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	53,991
1992-1996	State excluding 98221	7.6	7.1	8.1	1,008	13,429,132
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	49,653

Prostate		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	144.9	143	146.8	24,068	16,549,929
2007-2011	98221 Zip Code (eight 2010 census tracts)#	191.8	165.3	223.7	194	56,625
2002-2006	State excluding 98221	168.1	165.9	170.3	22,984	15,458,111
2002-2006	98221 Zip Code (eight 2010 census tracts)£	184	156.5	217.6	161	53,904
1997-2001	State excluding 98221	179	176.6	181.5	21,043	14,445,030
1997-2001	98221 Zip Code (eight 2010 census tracts)£	205.8	175.4	243.3	167	51,408
1992-1996	State excluding 98221	185.8	183.2	188.5	19,378	13,282,721
1992-1996	98221 Zip Code (eight 2010 census tracts)£	184.3	153.2	222.5	132	47,535

* Rates are per 100,000, age-adjusted; 95% confidence intervals for rates.

~ Statistic could not be calculated.

^ Statistic not displayed due to fewer than 20 cases.

Compared to the State minus 98221:

Higher incidence rate

¥ Lower incidence rate

£ Similar incidence rate

Myeloma		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	5.8	5.6	6.1	1,978	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	5.9	5.6	6.2	1,761	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	6.1	5.8	6.4	1,629	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	5.9	5.6	6.2	1,402	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Leukemia		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	14.3	13.9	14.7	4,814	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)£	16.7	10.8	25.8	30	116,379
2002-2006	State excluding 98221	14.6	14.2	15.1	4,381	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)£	14.8	9.6	23.5	27	110,674
1997-2001	State excluding 98221	14.9	14.4	15.4	4,021	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)£	17.5	11.4	27.8	27	105,399
1992-1996	State excluding 98221	14.1	13.6	14.6	3,432	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Breast (Female)		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	169.7	167.8	171.6	31,123	16,631,605
2007-2011	98221 Zip Code (eight 2010 census tracts)£	158.2	131.7	190.5	148	59,754
2002-2006	State excluding 98221	169.3	167.3	171.3	27,774	15,544,989
2002-2006	98221 Zip Code (eight 2010 census tracts)£	171.9	145	204.7	154	56,770
1997-2001	State excluding 98221	183.1	180.9	185.3	26,694	14,558,638
1997-2001	98221 Zip Code (eight 2010 census tracts)£	182.8	152.6	220.1	136	53,991
1992-1996	State excluding 98221	162.9	160.7	165.1	21,052	13,429,132
1992-1996	98221 Zip Code (eight 2010 census tracts)£	164.6	134.4	202.3	113	49,653

Cervix Uteri		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	6.9	6.5	7.3	1,179	16,631,605
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	59,754
2002-2006	State excluding 98221	7.1	6.7	7.5	1,116	15,544,989
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	56,770
1997-2001	State excluding 98221	7.8	7.4	8.3	1,156	14,558,638
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	53,991
1992-1996	State excluding 98221	8.9	8.4	9.5	1,192	13,429,132
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	49,653

* Rates are per 100,000, age-adjusted; 95% confidence intervals for rates.

~ Statistic could not be calculated.

^ Statistic not displayed due to fewer than 20 cases.

Compared to the State minus 98221:

Higher incidence rate

¥ Lower incidence rate

£ Similar incidence rate

Brain and Other Nervous System		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	7.4	7.1	7.7	2,526	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	7.5	7.2	7.8	2,300	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	7.6	7.3	8	2,126	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	7	6.7	7.4	1,782	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Thyroid		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	12.9	12.5	13.3	4,410	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	10	9.7	10.4	3,152	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	7.6	7.3	8	2,203	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding Fidalgo, Guemes and Cypress islands	6	5.7	6.3	1,571	26,711,853
1992-1996	State excluding 98221	^	^	^	^	97,189

Hodgkin Lymphoma		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	2.9	2.7	3.1	964	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	2.9	2.7	3.1	908	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	3	2.8	3.2	868	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	2.9	2.7	3.1	775	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Non-Hodgkin Lymphoma		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	21.2	20.7	21.7	7,226	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)£	26.3	19.9	35.6	58	116,379
2002-2006	State excluding 98221	22.7	22.1	23.2	6,853	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)£	30	22.4	40.9	54	110,674
1997-2001	State excluding 98221	21.4	20.8	21.9	5,786	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)£	16.3	10.4	26.3	25	105,399
1992-1996	State excluding 98221	19.9	19.3	20.5	4,855	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)£	20.5	13.2	32	27	97,189

* Rates are per 100,000, age-adjusted; 95% confidence intervals for rates.

~ Statistic could not be calculated.

^ Statistic not displayed due to fewer than 20 cases.

Compared to the State minus 98221:

Higher incidence rate

¥ Lower incidence rate

£ Similar incidence rate

Soft Tissue including Heart		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	3.4	3.2	3.6	1,146	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	3	2.8	3.2	896	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	3.1	2.9	3.4	873	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	3	2.8	3.2	747	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Melanoma of the Skin		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	45.2	44.5	46	15,577	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)#	82.1	68.4	98.6	150	116,379
2002-2006	State excluding 98221	42.3	41.6	43	13,036	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)#	66.2	53.3	82.3	104	110,674
1997-2001	State excluding 98221	36.3	35.6	37	10,119	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)£	41.1	30.4	55.8	55	105,399
1992-1996	State excluding 98221	27.4	26.8	28.1	6,887	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)£	31.8	22.6	45	42	97,189

Urinary Bladder		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	22	21.5	22.5	7,370	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)#	30.3	23	40.5	64	116,379
2002-2006	State excluding 98221	24.2	23.6	24.7	7,122	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)#	35.5	27.2	47	65	110,674
1997-2001	State excluding 98221	24.3	23.7	24.9	6,427	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)£	21.5	15.2	31.8	38	105,399
1992-1996	State excluding 98221	23	22.4	23.6	5,486	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)£	20.7	13.8	31.7	30	97,189

Kidney and Renal Pelvis		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	16.2	15.8	16.7	5,629	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)£	17.4	11.8	26.3	33	116,379
2002-2006	State excluding 98221	14.9	14.5	15.4	4,568	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)£	13	8	21.6	22	110,674
1997-2001	State excluding 98221	12.7	12.2	13.1	3,423	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	11.6	11.2	12	2,785	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

* Rates are per 100,000, age-adjusted; 95% confidence intervals for rates.

~ Statistic could not be calculated.

^ Statistic not displayed due to fewer than 20 cases.

Compared to the State minus 98221:

Higher incidence rate

¥ Lower incidence rate

£ Similar incidence rate

Liver and Intrahepatic Bile Duct		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	7.9	7.6	8.2	2,848	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	6.1	5.9	6.4	1,905	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	5.2	4.9	5.5	1,404	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	4.1	3.8	4.3	979	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Pancreas		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	12.5	12.1	12.9	4,269	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)£	11.1	6.8	18.7	23	116,379
2002-2006	State excluding 98221	11.9	11.5	12.3	3,530	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)£	11.2	6.9	19	21	110,674
1997-2001	State excluding 98221	11.9	11.5	12.3	3,163	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)£	13.1	8	22.4	21	105,399
1992-1996	State excluding 98221	11.1	10.7	11.5	2,620	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Larynx		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	3.1	2.9	3.2	1,065	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	3.3	3.1	3.5	989	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	4.1	3.9	4.4	1,109	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	4.5	4.3	4.8	1,093	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Lung and Bronchus		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	62.5	61.7	63.4	20,907	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)£	54.9	45.3	67.3	116	116,379
2002-2006	State excluding 98221	69	68	69.9	20,236	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)¥	53	43	66	99	110,674
1997-2001	State excluding 98221	73.3	72.3	74.3	19,382	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)£	60.5	49.1	75.4	101	105,399
1992-1996	State excluding 98221	72.6	71.5	73.7	17,456	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)£	64.5	51.5	81.2	91	97,189

* Rates are per 100,000, age-adjusted; 95% confidence intervals for rates.

~ Statistic could not be calculated.

^ Statistic not displayed due to fewer than 20 cases.

Compared to the State minus 98221:

Higher incidence rate

¥ Lower incidence rate

£ Similar incidence rate

Esophagus		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	5.3	5.1	5.6	1,837	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	5.2	4.9	5.5	1,543	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	5.9	5.6	6.2	1,579	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	5	4.7	5.3	1,202	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Stomach		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	6.3	6	6.6	2,144	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	6.5	6.2	6.8	1,952	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	7	6.7	7.3	1,858	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	7.3	6.9	7.6	1,730	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

Colon and Rectum		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	40.3	39.6	41	13,738	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)£	35.2	27	46.5	70	116,379
2002-2006	State excluding 98221	47.6	46.8	48.4	14,233	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)£	48.9	38.7	62.2	86	110,674
1997-2001	State excluding 98221	56.1	55.2	57	14,904	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)£	52.8	42.1	67.2	86	105,399
1992-1996	State excluding 98221	56.3	55.3	57.2	13,353	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)£	47.6	36.8	62.2	69	97,189

Anus, Anal Canal and Anorectum		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	3.4	3.2	3.6	1,207	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	116,379
2002-2006	State excluding 98221	2.2	2.1	2.4	698	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	1.8	1.6	1.9	490	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	0	0	6.8	0	105,399
1992-1996	State excluding 98221	1.6	1.5	1.8	398	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

* Rates are per 100,000, age-adjusted; 95% confidence intervals for rates.

~ Statistic could not be calculated.

^ Statistic not displayed due to fewer than 20 cases.

Compared to the State minus 98221:

Higher incidence rate

¥ Lower incidence rate

£ Similar incidence rate

Appendix B: WSCR Data Comparing 98221 Cancer Rates to State's Rates

Incidence Data (Washington State Cancer Registry): 98221 versus WA State

"98221 Residents": residents from eight 2010 Census Tracts on Fidalgo, Guemes, Sinclair and Cypress Islands

"Washington State Residents": the entire State, minus the "98221 Residents" data

Table Legend:

- CI *Confidence Interval*: the range of values for which we're 95% certain the true cancer rate lies.
- * Rates are per 100,000, age-adjusted to the 2000 US Std Population (19 age groups) standard; 95% confidence intervals for rates.
- ~ Statistic could not be calculated.
- ^ Statistic not displayed due to fewer than 20 cases.
- # Higher incidence rate compared to the State minus 98221
- ¥ Lower incidence rate compared to the State minus 98221
- £ Similar incidence rate compared to the State minus 98221

All Sites (26) Combined		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	528.3	525.9	530.8	182,284	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts) [#]	571.5	536.5	609.2	1,115	116,379
2002-2006	State excluding 98221	547	544.4	549.7	165,559	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts) [£]	582.9	546.3	622.4	1,016	110,674
1997-2001	State excluding 98221	555.1	552.3	557.9	149,754	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts) [£]	528.5	492.3	568.1	829	105,399
1992-1996	State excluding 98221	530	527.1	533	128,424	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts) [£]	505	466.9	546.5	703	97,189

Oral Cavity and Pharynx		Rate*	Lower CI	Upper CI	Total Count	Total Population
2007-2011	State excluding 98221	12	11.6	12.4	4,304	33,181,534
2007-2011	98221 Zip Code (eight 2010 census tracts) [£]	11.8	6.9	20	20	116,379
2002-2006	State excluding 98221	11.5	11.2	11.9	3,581	31,003,100
2002-2006	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	110,674
1997-2001	State excluding 98221	11.8	11.4	12.2	3,212	29,003,667
1997-2001	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	105,399
1992-1996	State excluding 98221	12.5	12.1	13	3,012	26,711,853
1992-1996	98221 Zip Code (eight 2010 census tracts)	^	^	^	^	97,189

* Rates are per 100,000, age-adjusted; 95% confidence intervals for rates.

~ Statistic could not be calculated.

^ Statistic not displayed due to fewer than 20 cases.

Compared to the State minus 98221:

Higher incidence rate

¥ Lower incidence rate

£ Similar incidence rate

Appendix A: WSCR Data Comparing Skagit County Cancer Rates to Washington State Rates

2007-2011 Average Age-Adjusted Cancer Rates, Skagit County Compared to State

Cancer Type:	Age Adjusted Rate/100,000		Percent Difference
	Residents of Skagit County	WA Residents (Remaining 38 Counties)	
Melanoma (Skin)	58.6	45.2	30%
Bladder	28.3	21.9	29%
Kidney & Renal	20.2	16.2	25%
Leukemia	17.8	14.2	25%
Prostate	167	144.7	15%

Source: Washington State Cancer Registry, Department of Health (September 2014).

5. Anacortes Refineries are Habitual High Priority Violators of Clean Air Act. Federal, state, and local laws guarantee people inalienable rights to healthy air, land, water, and ecosystem services, and elected officials swear in an Oath of Office to uphold state laws:

- The Federal Clean Air Act protects public health and welfare from harmful industrial pollution.
- Washington’s Clean Air Act aims to “preserve, protect and enhance the air quality for future and current generations,” as well as “comply with the federal CAA... protect human health and safety ... prevent injury to plant, animal life, and property ... and protect public welfare.”¹⁶
- City of Anacortes code 17.15.020 restricts March Point Heavy Manufacturing District uses to those that do not inflict upon neighbors “smoke, dirt, noise, vibrations, odor, glare, or other nuisances or hazards detrimental to the health, welfare, and safety of persons” in or adjacent to the district.

Nonetheless, public records show that Anacortes refineries regularly violate the CAA. As shown by the EPA *ECHO Report* data presented in Table 1, Shell Oil’s Puget Sound Refinery averages one Formal Enforcement Action (serious CAA violation) every quarter.¹⁷ The U.S. EPA designates Shell and Tesoro refineries *High Priority Violators* of the CAA for toxic “discharges of sufficient magnitude or duration to be a regulatory priority” (failing to monitor, manage, or properly control carcinogenic benzene streams or emissions, for example).¹⁸ At the time of reporting (June 2015), Tesoro refinery was in *Significant Violation* (“...the most serious level of violation”) of the federal Clean Air Act.¹⁹

Table 1. 98221 Petroleum Refineries: Enforcement Compliance History Online (ECHO).^a

Metric	Shell Puget Sound Refinery	Tesoro Anacortes Refinery	Remaining 58 Facilities (Median)
Toxic Releases (lbs./year)	192,116 lbs.	185,326 lbs.	0
CAA Violations (last 12 quarters)	10	12	0
“Notices of Violation” (5 years) ^b	23	4	0
Formal Enforcement Actions (5 years) ^c	21	4	0
Penalty Count (5 years)	20	4	0
Total Penalties (5 years)	\$1,118,600	\$1,195,000	0

^a ECHO report data retrieved and compiled by CEHA (June 16, 2015).

^b *Notices of Violation* (NOV) allege CAA violations at a facility and trigger a 30-day period in which the facility may provide information regarding the allegation to the enforcement agency.²⁰

^c *Formal Enforcement Actions* may be issued after 30 days, and are typically an *administrative penalty order* (fine), but may include injunctive relief (corrective actions) or other actions.²¹

¹⁶ *Access Washington*. Retrieved from: <http://apps.leg.wa.gov/rcw/default.aspx?cite=70.94>

¹⁷ Facility search results for 98221, U.S. Environmental Protection Agency, *Enforcement and Compliance History Online (ECHO)*. Retrieved from <http://echo.epa.gov/facilities/facility-search/results>.

¹⁸ *Ibid.*

¹⁹ *Ibid.*

²⁰ Mahar, Toby, information request from NWCAA (May 22, 2015)

²¹ *Ibid.*

DISCUSSION

CEHA members are not epidemiologists, but our research could provide clues about the potential cause(s) of high-incidence cancers among 98221 residents.

1. **Health & Behavioral Risk Factors Similar in Skagitonians & Washingtonians.** A State DOH *Chronic Disease Profile* (2013) comparing Skagit residents to those of Washington State showed “no statistically detectable difference” between the populations’ health risk factors (smoking, cancer screenings, annual physicals, physical activity, adult obesity, asthma, diabetes, or heart disease).⁹ CEHA could not find comparable health risk data for the 98221 zip code.
2. **Demographically, Anacortes Residents Differ Slightly from Washingtonians.** Compared to Washington State, Anacortes’ population is older (accounted for by using age-adjustment), has more Veterans, and more residents of European ancestry (a possible clue to our higher melanoma rate).¹⁰ Although median household income is about the same, a smaller proportion of the Anacortes population lives below poverty level. CEHA could not find comparable demographic data for 98221.
3. **Public Water Quality in Full Compliance.** The City of Anacortes provides potable water to 56,000 customers in Skagit and Island counties. According to its *Consumer Confidence Reports*, Anacortes’ drinking water has “never violated a primary maximum contaminant level.”¹¹ The City’s 2006 report noted that the EPA had “tightened the maximum contaminant level for arsenic” from 50 to 10 parts per billion. “The results of our annual testing found no arsenic detected in our water.”¹² CEHA could not find water-quality data for private water systems in 98221.
4. **Fidalgo Bay Polluted with Hazardous Industrial Chemicals.** Recently, the DOH tested Fidalgo Bay sediment and seafood tissues to investigate the “human health hazards posed by toxic contaminants.”¹³ DOH found Bay sediment contaminated with carcinogenic polycyclic aromatic hydrocarbons (cPAHs). Seafood tissues had excessive levels of arsenic, chromium, copper, lead, mercury, and dioxins. DOH concluded that eating contaminated Fidalgo Bay seafood at tribal consumption rates was “expected to harm children and adults” and represents “a public health hazard” for tribes harvesting and eating seafood from this “usual and accustomed fishing rights area.”¹⁴ DOH recommended seafood limits for the general public, too: eat no more than 14 clams a month, no crab “butter,” no more than one meal a month of native Chinook salmon (96% of our resident orcas’ diet), as well as other meal limits for other seafood species.¹⁵

⁹ Washington State Department of Health, *Chronic Disease Profile: Skagit County*, (October 2013). Retrieved from <http://www.doh.wa.gov/portals/1/Documents/Pubs/345-271-ChronicDiseaseProfileSkagit.pdf>.

¹⁰ U.S. Census Bureau, *State & County Quick Facts*. Retrieved from gov/qfd/states/53/5301990.html.

¹¹ City of Anacortes, *Water Quality Reports*. Retrieved from <http://www.cityofanacortes.org/reports.php#VOZxffnF9IQ>.

¹² City of Anacortes, *Consumer Confidence Report: January 1 – December 31, 2003 Annual Report*. Retrieved from http://www.cityofanacortes.org/docs/WTP/2006_CCR.pdf.

¹³ Washington State Department of Health, *Health Consultation: Fidalgo Bay, Anacortes, Skagit County, Washington*, Prepared Under a Cooperative Agreement with the U.S. Agency for Toxic Substances and Disease Registry, (2010). Retrieved from <http://www.atsdr.cdc.gov/HAC/pha/FidalgoBay/FidalgoBayHC02252010.pdf>.

¹⁴ Ibid., 28.

¹⁵ PS Ross et al., *High PCB Concentrations in Free Ranging Pacific Killer Whales, Orcinus orca: Effects of Age, Sex and Dietary Preference*, Marine Pollution Bulletin, Vol. 40, No. 6, p. 507, (2000). Retrieved from: <http://www.nwfsc.noaa.gov/research/divisions/cb/ecosystem/marinemammal/kworkshops/preypubs/pcbapacickw.pdf>

- Can WSCR more precisely map these three high-incidence cancers? Are they correlated with Census Tracts downwind of the March Point Heavy Manufacturing District?
- Does any agency have dispersion models showing how March Point industrial pollution diffuses through the region?
- Is dispersion modeling available on carcinogenic Fidalgo Bay sediment during high coastal winds?
- Is there agency information available about toxic pollutants in the 98221 biosphere (air, land or water) that might be linked to our high-incidence cancers? For example, does a state or county agency have data about arsenic in private water systems (or other possible environmental sources of arsenic)?
- Do the overpowering refinery odors one encounters occasionally on Highway 20 indicate that one is being exposed to harmful toxins or carcinogens?
- What are the *actual* fence line concentrations of toxic pollutants when refineries are violating CAA regulations—that is, measured (not mathematically modeled) levels of volatile organic compounds, heavy metals, particulates, and other toxicants and carcinogens? What are the fence-line concentrations of these carcinogens & toxicants when the refineries are not in violation of CAA regulations?
- Does refinery pollution create non-cancer health hazards? For example, tetrachloroethylene (a carcinogen in refinery discharges) is linked in the literature to an increased incidence of Parkinson's disease. Does our community have an elevated rate of Parkinson's?
- Does Ecology monitor toxic leaks at March Point tank farms, or are those self-reported by refineries? Are there storage-tank-leak issues at March Point? How does the public access tank-farm monitoring reports?
- Does any agency have information about the actual (not modeled) emissions from tanker cars at the Tesoro unloading facility? Has NWCAA used its FLIR camera to investigate VOC leaks (from oil-trains or infrastructure) at the Tesoro facility?
- Given that Anacortes refineries are habitual *High Priority Violators* of the CAA, why doesn't the Northwest Clean Air Agency levy maximum fines as a deterrent to ongoing violations of public safety and environmental laws?
- Given the specificity of Anacortes code (17.15.020) restricting uses of the March Point Heavy Manufacturing District to those with *no hazards detrimental to health or safety*, do our public health agencies agree that habitual violators of the CAA are a permitted use at the March Point Manufacturing District?
- Given the high incidence of melanoma, bladder cancer and prostate cancer, is a cancer-prevention program recommended for our community?
- Should we have a community educational program on ways of preventing human exposure to the harmful pollutants in and around the Fidalgo Bay Aquatic Reserve?
- Should signage be erected around the Bay warning outdoor recreationists about the shoreline being contaminated with carcinogens?
- Should DOH seafood consumption recommendations for Fidalgo Bay be posted at boat ramps?

- 6. Two Refineries Discharge Virtually All Toxic Pollution in 98221.** This Salish Sea refinery town, home to a marine port and the March Point Heavy Manufacturing District, is no stranger to toxic pollution. A \$2.3 million decontamination project is underway at the former Shell Oil tank farm in downtown Anacortes.²² In this third effort to keep the site's carcinogenic benzene, cadmium and PAH contaminants at harmless levels, Ecology discovered a plume of benzene and petroleum hydrocarbons migrating away from the site under Q Avenue toward Fidalgo Bay.²³ The EPA *Enforcement Compliance History Online* (ECHO) website lists 60 facilities in 98221 that are required to comply with environmental regulations. At a combined 377,400 pounds of toxic waste annually, Shell and Tesoro produce 90% of all toxic pollution in this refinery fence-line community.²⁴
- 7. Refinery Emissions Contain Cancer-Causing Chemicals.** Given that Shell and Tesoro refineries produce virtually all the community's toxic pollution, we wondered if any of the known or suspected carcinogens listed in the refineries' *Toxics Release Inventory* (TRI) were causally linked in the scientific literature to any of 98221's high-incidence cancers. Indeed, a handful of refinery carcinogens are known or suspected causes of melanoma of the skin, bladder cancer, and/or prostate cancer. Arsenic is known to cause all three cancers.²⁵ Carcinogenic polycyclic aromatic hydrocarbons (cPAHs) are a known to cause melanoma, and are suspected of causing bladder and prostate cancer.²⁶

CONCLUSIONS

Washington State Cancer Registry data (2007-2011) reveal that 98221 residents had three high-incidence cancers. It is possible that the cancers amassed here randomly, or are a statistical anomaly. Perhaps our high cancer rates are explained by as-yet-unknown confounding variables (better case reporting, more people of European ancestry, or more Veterans, for example). However, in a refinery fence-line community with three high-incidence cancers, it is also possible that toxic chemicals in the 98221 biosphere caused or promoted the cancers.

The toxic degradation of Fidalgo Bay Aquatic Reserve is startling, because this community's economic future is dependent on natural resource industries (agriculture, boating, tourism, and fishing) that require healthy air, water, land, and ecosystem services. Environmental laws were designed to protect the health of people, ecosystems and economies, and the hazardous contamination of Fidalgo Bay raises questions about whether 98221 residents receive the public safety protections guaranteed them by law.

We see a great need for continued research to learn more about the three high-incidence cancers in our community. In the second phase of this project, CEHA will seek the assistance of public agencies to investigate the following:

- Conventional wisdom is that the young are especially susceptible to the adverse effects of toxicants. How do our children's rates of cancer and other environmental diseases compare to the State?

²² City of Anacortes, *Council Packet for January 13, 2014*. Retrieved from: http://www.cityofanacortes.org/document_center/CouncilPackets/2014/20140113CCPacket.pdf

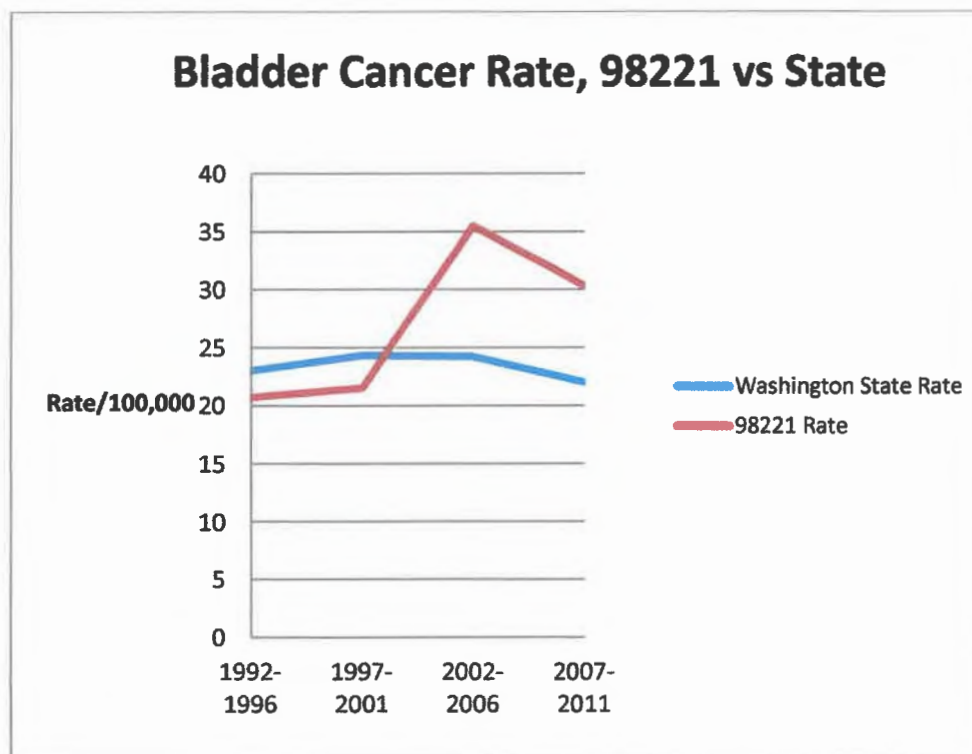
²³ City of Anacortes, *Council Packet*, page 4

²⁴ U.S. Environmental Protection Agency, *ECHO Report*.

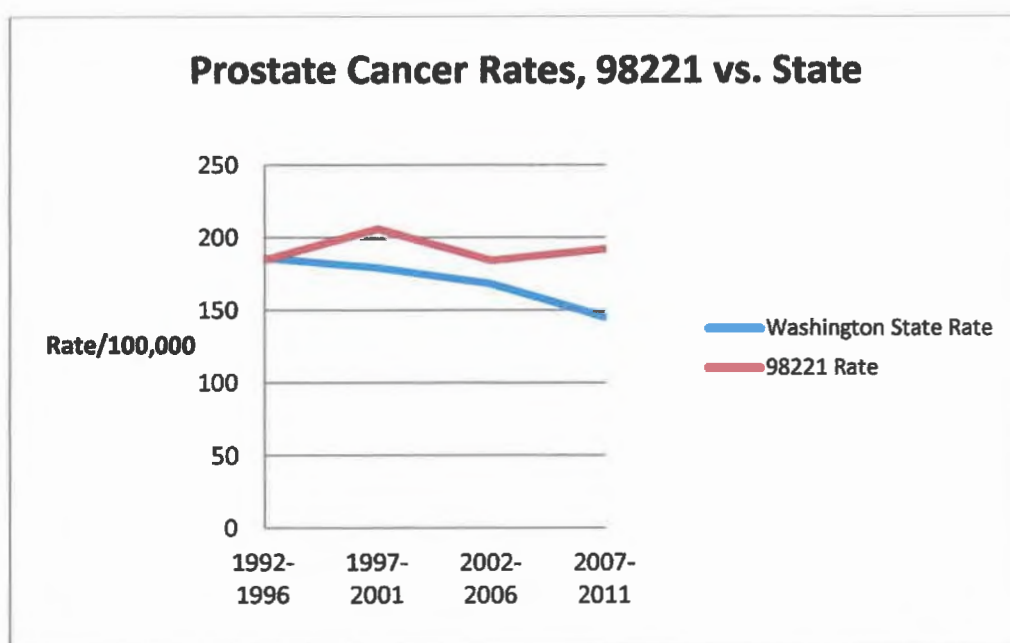
²⁵ International Agency for Research on Cancer, *IARC monographs, Arsenic and arsenic compounds*, p51. Retrieved from: <http://monographs.iarc.fr/ENG/Monographs/vol100C/mono100C-6.pdf>

²⁶ Clapp, R.W., Jacobs, M.M., and Loechler, E.L., *Environmental and occupational causes of cancer new evidence, 2005–2007, Reviews on Environmental Health*, 23(1): 1-37 (2007). Retrieved from <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2791455/>

From 2007-2011, the age-adjusted incidence of bladder cancer among 98221 residents was 38% higher than the State's bladder cancer incidence.



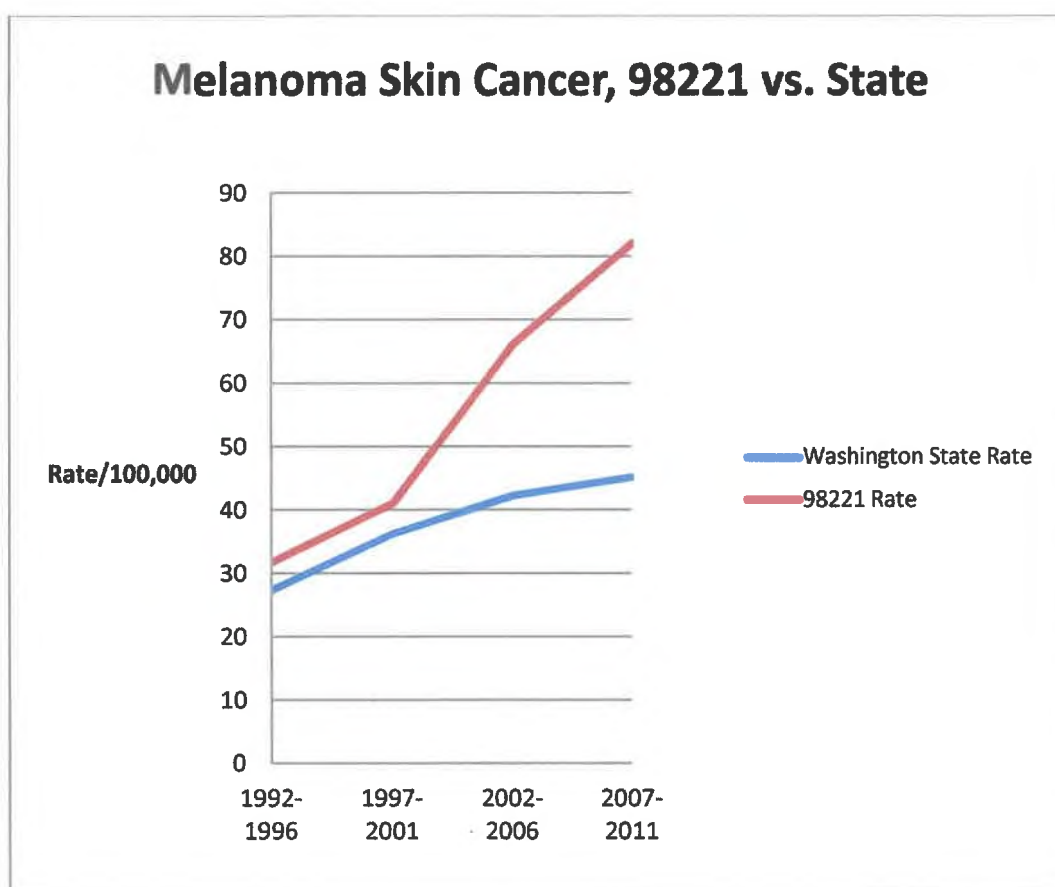
WSCR data for 2007-2011 show that the incidence of prostate cancer among 98221 residents was 32% higher than the State's prostate cancer rate.



CANCER REGISTRY RESULTS

The charts below show 20 years of WSCR cancer incidence data (see Appendix B for raw data), and they chart cancer rate trends for the 98221 zip code and Washington State.⁸ During the most-recent five-year period (2007-2011), residents of 98221 had significantly higher rates of three cancer types: melanoma skin cancer, bladder cancer, and prostate cancer.

Melanoma is on the rise in both populations, but the rate of new cases is increasing much faster in 98221. WSCR data for 2007-2011 show that the incidence of melanoma skin cancer among 98221 residents was 82% higher than Washington's rate.



⁸ Graphs represent 20 years of cancer incidence data from the Washington State Cancer Registry. *Rate*: new cases per 100,000 residents. "State Resident" cancer rates exclude 98221 residents.

INTRODUCTION

The 2013 Washington State Cancer Registry (WSCR) *Annual Report* revealed that Skagit County had the highest *age-adjusted* bladder cancer rate among Washington's 39 counties (41% higher than Washington's bladder cancer rate) as well as third-highest cancer rate overall.² The *Report* showed that Skagit County had a statistically significant excess of five cancer types: bladder, kidney and prostate cancers, melanoma skin cancer, and leukemia (see data in Appendix A).

Those *Annual Report* findings caught the attention of a handful of Anacortes women who formed the Community Environmental Health Assessment (CEHA) Task Force and embarked on a two-year investigation of cancer in their industrial *fence-line community*, the 98221 zip code.³ After nearly a year of background research, CEHA developed its research design and requested 98221 cancer incidence data from the State Cancer Registry.

STUDY APPROACH

CEHA wanted to determine the incidence of cancers in two populations: the City of Anacortes and the larger Fidalgo-Guemes Island community. WSCR agreed to provide the data analyses for the study. Before submitting the data request, CEHA had to define the study parameters.⁴ Specifying the *population(s) of interest* required immersing ourselves in research about potential confounding causal factors that might affect 98221 cancer rates, such as residents' health behaviors and socioeconomic characteristics; drinking water quality; ecosystem health; industrial pollution and compliance with public-safety laws.⁵

Once the background research was complete, CEHA selected three populations of interest: the 98221 zip code,⁶ City of Anacortes, and—for comparison—Washington State. WSCR could not separately analyze Anacortes' cancer rates, because City boundaries do not correspond to U.S. Census boundaries, which the Registry uses. However, CEHA recently discovered GNIS and FIPS codes (2909702 and 53/01990, respectively),⁷ which should enable WSCR to investigate Anacortes cancer data going forward.

² *Age adjustment* (standardization) is a statistical technique that enables comparisons of disease rates among two groups with dissimilar age distributions. The age-adjusted cancer rates in WSCR data represent the rates that *would have existed* if the (slightly older) 98221 zip code had the same age distribution as Washington State. WSCR's cancer rates are age-adjusted to the 2000 U.S. Standard Population (19 age group) standard. Washington State Cancer Registry, *2008-2010 Washington State residents' annual average incidence & death by county*, Washington State Department of Health (2013). Retrieved from <https://fortress.wa.gov/doh/wscr/WSCR/PDF/10Report/CancerBySiteTables10.pdf>.

³ A *fence-line community* is adjacent to a business and impacted by the operations of that business.

⁴ *Study parameters* (specifications) included (1) 20 years of Registry data, divided into four five-year periods, (2) all 26 cancer types tracked by WSCR, and (3) three populations of interest (i.e., unique geographic areas).

⁵ *Confounding factors*: independently associated risk factors that may bias the estimate of impact being studied, such as dietary or ethnicity differences between two populations.

⁶ The 98221 zip code is comprised of eight census tracts on Fidalgo, Guemes and Cypress Islands.

⁷ *GNIS* (Geographic Names Information System Identifier) is a permanent, numeric identifier associated with each geographic entity uniquely within the nation). *FIPS* codes are from the Federal Information Processing Series. Both geographic identifiers are issued by the American National Standards Institute (ANSI).

ACKNOWLEDGMENTS

This study would not have been possible without the advice and support of many individuals and organizations. I am especially indebted to Dr. Mahesh Keitheri Cheteri, Epidemiologist, Washington State Cancer Registry, Washington Department of Health, for generously providing cancer incidence data and analyses for residents of the 98221 zip code.

My heartfelt thanks to CEHA colleagues for your support and assistance in literature research and study design. This project would not have been possible without the support of Heather Burke, Andrea Doll, Carolyn Gastellum, and Kay O'Connell.

CEHA appreciated the valuable ideas, insights, and information provided by Evelyn Adams, Dr. Chip Bogosian (MD), Dr. Tammi Boston (MD), Dr. Doris Brevoort (PhD), the late Ron Carstens, Jan Hersey, Sandra Spargo, Callie Martin, Nan Monk, Connie Snell, Dr. Ginny Wolff (MD), and Susan Wood. I am especially grateful to Evelyn Adams, Chip Bogosian, Doris Brevoort and Connie Snell for thorough, constructive critiques of the draft report. Your thoughtful input compelled me to revisit the scientific literature, update information, and try harder to untangle and explain such technical information.”

Jan Woodruff (BS, MBA)¹
WSCR Study Team Leader
CEHA Task Force

¹ CEHA members are retirees from education, science, business, and government. Jan Woodruff, team leader on this project, retired from a career in research and analysis. In the 1970's Woodruff earned a BS in Microbiology (pre-veterinary medicine). She spent her first career in medical research at Oregon Health Sciences University. In the 1980's, Woodruff earned an MBA (marketing research and planning). She had a marketing consulting practice in Portland, OR for two decades before retiring in 2007.

Port awards contract for cleanup at former Shell tank farm site

*taxpayers funded
not SEPA's intent*

Posted: Wednesday, September 10, 2014 6:00 am

Clearcreek Contractors Inc. of Marysville was awarded a contract to clean up the former Shell Oil tank farm site by the Port of Anacortes at its Sept. 4 commissioners meeting.

The cost of the project is \$2.3 million, including state taxes, engineering oversight and project administration. Financial reimbursements will come from Washington State Department of Ecology under the Remedial Action Grant program and Liberty Insurance, according to the port.

The site, a little more than half an acre east of McDonald's at 14th Street and Q Avenue, is currently used for boat trailer parking.

The property was once a portion of Fidalgo Bay's tideflats. It was filled in to the current level between 1925 and 1929, according to Ecology. The port purchased the property in 1929 and began leasing it to Shell Oil a year later.

Three 25,000-gallon above-ground storage tanks and a 2,000-gallon underground tank were used. In the 1950s, two more 12,500-gallon above-ground tanks were added and the underground one was replaced with a larger tank.

Operations on the property stopped around 1987 when the storage tanks, piping and structures were removed.

Today the property is contaminated with gasoline, diesel, heavy oil, benzene, cadmium and various hydrocarbons.

The cleanup project will entail excavation of overburden and contaminated materials, backfilling, grading and site restoration. It is expected to begin in October and be completed by late November.

This is the fourth environmental site cleanup under Focus Fidalgo, an integrated cleanup program by the port and Ecology.

Upon completion of the cleanup project, the site will be returned to its use as trailer boat parking for Cap Sante Marina, according to the port.

Community News

Local cleanup projects total \$50-million

→ \$3M remediation -
2nd 3rd - of
Former Shell Tank
farm

🕒 Published: Monday, Mar. 16, 2009

✍ Written by Art Shotwell



oil bubbling
up on map III
...



When environmental cleanup projects around Fidalgo Island are completed in about two years, the total cost will end up around \$50-million, with the state paying about one-half the cost and landowners paying the rest.

Through the Puget Sound Initiative, Washington State has committed the resources and funding for a healthier Puget Sound and surrounding communities. The Puget Sound Initiative is a collaborative effort – by local, tribal, state and federal governments, business, agricultural and environmental interests, and the public – to restore and protect the Sound.



A leading source of pollution to the Sound is contaminated sites around its shorelines. Ecology's Toxics Cleanup Program has identified contaminated sites within one-half mile of the Sound. In response to the Puget Sound Initiative and increased funding, Ecology has accelerated its efforts to clean and restore contaminated sites within identified priority bays. These areas are the cornerstones of Ecology's approach to protect and restore Puget Sound.

Cap Sante Marina (\$2-5-million)

The Cap Sante Marine Site has been operated as a boat yard and marina support area since 1959. In the early 1980s, fuel was observed seeping from an underground storage tank into the waters of Fidalgo Bay next to the site. Fuel was recovered and the seepage was stopped. But, however, impacted soils linked to the prior petroleum leakage were not removed.

The Port of Anacortes, the current owner is entering into an Agreed Order with Ecology who will remove the USTs and any contaminated soils. Future plans for the site include construction of a new dry storage and boat launch. Along the shoreline, public access has already been improved by a walkway, built into the overall marina.

Custom Plywood (\$2-7-million)

This waterfront site was used as a mill and box factory. The site is currently undergoing cleanup work. A sawmill and wood-box factory, and then a plywood mill, operated on the site for almost a century.

Dakota Creek (\$3-4-million)

The site is currently an active shipyard, used for the construction and repair of vessels. Historical uses at the site have resulted in soil, groundwater, and sediment contamination.

Former Scott Paper Mill (\$22-26-million)

This is by far the largest and most expensive cleanup in Fidalgo Bay. A lumber mill, and later a pulp mill operated on the Scott Paper Mill Site beginning in the late 1800s through the late 1970s. The pulp mill used waste from the lumber mill and discharged waste water directly to Fidalgo Bay. Metals, diesel- and motor oil-range petroleum hydrocarbons, carcinogenic polynuclear aromatic hydrocarbons (cPAHs), polychlorinated biphenyls (PCBs), and dioxins/furans have been found in soil at the Site above Washington State cleanup levels. Many of these contaminants were also found in groundwater (low levels) and marine sediments. In 1999, the Port of Anacortes and Sun Healthcare Systems conducted an independent cleanup action to remove petroleum-contaminated soil and wood debris on one of the parcels within the Site. Portions of the property have been operated recently by multiple entities that have used the Site as a log yard, a staging area for oil field equipment, a boat manufacturing site, storage, and a modular home assembly area. The northern portion of the Site is now primarily Seafarers' Memorial Park, and the southern portion is primarily vacant.

Former Shell Oil Tank Farm (\$2-3.55-million)

The Former Shell Oil Tank Farm was used to distribute gasoline, diesel, oil, and other chemical products. Gasoline, diesel, and heavy oil contamination has been found in soil and groundwater samples collected around the site. The amount of contamination in the soil samples was above Washington State cleanup levels. Six above ground storage tanks were removed from the site in the 1980's, and soil was removed in 1987 and 2007. However, the amount of remaining contamination is unknown. The site is currently used for boat trailer parking.

March Point Landfill (\$3-6-million)

The March Point Landfill, sometimes called the Whitmarsh Landfill, operated from 1950 to 1973. It initially served as an unregulated dump, and later as a county disposal area. Household, commercial, and industrial wastes were dumped at the site. Marine sediment samples show contamination from metals, phthalates, phenols, polycyclic aromatic hydrocarbons (PAHs), dioxins, and furans. Surface and seep samples from the landfill show contamination from metals (including arsenic, lead, copper, and mercury), petroleum compounds, and polychlorinated biphenyls (PCBs). Snow Mountain Company currently operates a sawmill on the Site. Further study is necessary to fully characterize the contamination at the Marsh Point Landfill.

Fidalgo Bay Causeway Study (\$160,000)

The Samish Indian Nation is using money from the Washington Department of Ecology (Ecology) to study how an old railroad causeway may impact habitat in Fidalgo Bay in Skagit County.

The tribe will lead a remedial investigation and feasibility study on part of the 3,300-foot recreational Tommy Thompson Trail extending over Fidalgo Bay. The trail stretches from tribal property at Weaverling Spit to March Point. Originally, the entire length was a trestle made up of creosote pilings. At some point, 1,500 feet of rock causeway was placed over roughly half the creosote pilings; 770 pilings remain, leaching into the marine environment. It's not known if the causeway contains other materials. The Samish believe removing the rock causeway and existing creosote pilings and replacing it with a more open, environmentally friendly support structure that continues to serve the public, will help improve eelgrass habitat by restoring more natural water flow and removing potential contamination. The City of Anacortes must approve any work beyond the investigation and study.


Other projects

- Pier 2 Log Haul Out (\$1-2.2-million)
- MJB Properties-central/south (\$250,000-1.5-million)
- Fidalgo Bay Sediments Study (\$400-550-thousand)
- Derelict Vessel Enchantress Removal (\$400-500-thousand)

Total Cost: \$38.55-55.55-million

Add comment

COMMENTS



No comments found



Polycyclic Aromatic Hydrocarbons (PAHs)

What are PAHs?

Short for polycyclic aromatic hydrocarbons, PAHs describe chemicals that are often found together in groups of two or more. PAHs are found naturally in the environment but they can also be man-made. In their purest form, PAHs are solid and range in appearance from colorless to white or pale yellow-green. PAHs are created when products like coal, oil, gas, and garbage are burned but the burning process is not complete. Although PAHs can exist in over 100 different combinations, the National Waste Minimization Program defines this group using the Toxic Release Inventory reporting category for polycyclic aromatic compounds.

Chemicals included in this category, by name and CAS number, are:

1. Benzo(a)anthracene, 56-55-3
2. Benzo(a)phenanthrene (chrysene), 218-01-9
3. Benzo(a)pyrene, 50-32-8
4. Benzo(b)fluoranthene, 205-99-2
5. Benzo(j)fluoranthene, 205-82-3
6. Benzo(k)fluoranthene, 207-08-9
7. Benzo(j,k)fluorene (fluoranthene), 206-44-0
8. Benzo(r,s,t)pentaphene, 189-55-9
9. Dibenz(a,h)acridine, 226-36-8
10. Dibenz(a,j)acridine, 224-42-0
11. Dibenz(a,h)anthracene, 53-70-3
12. Dibenz(a,e)fluoranthene, 5385-75-1
13. Dibenz(a,e)pyrene, 192-65-4
14. Dibenz(a,h)pyrene, 189-64-0
15. Dibenz(a,l)pyrene, 191-30-0
16. 7H-Dibenzo(c,g)carbazole, 194-59-2
17. 7,12-Dimethylbenz(a)anthracene, 57-97-6
18. Indeno(1,2,3-cd)pyrene 193-39-5
19. 3-Methylcholanthrene, 56-49-5
20. 5-Methylchrysene, 3697-24-3

21. 1-Nitropyrene, 5522-43-0

It should be noted that some PAHs are listed individually on EPA's Priority Chemical list. They are:

1. Acenaphthene, 83-32-9 ~~4.5~~ 2011
2. Acenaphthylene, 208-96-8
3. Anthracene, 120-12-7 ~~4.5~~ 0
4. Benzo(g,h,i)perylene, 191-24-2
5. Fluorene, 86-73-7
6. Phenanthrene, 85-01-8 75
7. Pyrene, 129-00-0

Why are PAHs bad actors?

PAHs are a concern because they are persistent. Because they do not burn very easily, they can stay in the environment for long periods of time. Individual PAHs vary in behavior. Some can turn into a vapor in the air very easily. Most do not break down easily in the water.

What are PAHs used for?

Most PAHs are used to conduct research. However, some PAHs are used to make dyes, plastics, and pesticides. Some are even used in medicines.

How can PAHs enter and leave your body?

One of the most common ways PAHs can enter the body is through breathing contaminated air. PAHs get into your lungs when you breathe them. If you live near a hazardous waste site where PAHs are disposed, you are likely to breathe PAHs. If you eat or drink food and water contaminated with PAHs, you could be

fidalgos beach saturated — Recd no more than 1 exposure/wk

sed. Exposure to PAHs can also occur if your contacts PAH-contaminated soil or products heavy oils, coal tar, roofing tar, or creosote. Creosote is an oily liquid found in coal tar and is used to preserve wood. Once in your body, PAHs spread and target fat tissues. Target organs include the kidneys and liver. However, PAHs leave your body through urine and feces in a matter of days.

How can you be exposed to PAHs?

You can be exposed to PAHs in the environment, at your home, and in the workplace. Because PAHs exist naturally in the environment and are man-made, you can be exposed in a number of ways. Fumes from vehicle exhaust, coal, coal tar, asphalt, wildfires, agricultural burning and hazardous waste sites are all sources of exposure.

You could be exposed to PAHs by breathing cigarette and tobacco smoke, eating foods grown in contaminated soil, or by eating meat or other foods that you grilled. Grilling and charring food significantly increases the amount of PAHs in the food.

If you work in a plant that makes coal tar, asphalt, aluminum, or that burns trash, you can be exposed to PAHs. You can also be exposed if you work in a facility that uses petroleum or coal, or if wood, corn, and oil are burned.

How can PAHs affect your health?

A number of PAHs have caused tumors in laboratory animals that were exposed to PAHs through their food, from breathing contaminated air, and when it was applied to their skin. When pregnant mice ate high doses of a PAH (benzo(a)pyrene) they experienced reproductive problems. In addition, the offspring of the pregnant mice showed birth defects and a decrease in their weight. Other effects include damage to the body fluids, and the immune system. However, these effects have not been seen in humans.

Is there a medical test to determine if you have been exposed to PAHs?

There is a test that can measure the presence of PAH in your urine. This test can only tell you if you have been exposed; but it can't reveal how harmful the effects of the exposure will be. This test would have to be performed in a laboratory that has special equipment to detect the PAHs. Another test currently being developed will be able to measure PAHs in your body tissue and blood.

What are the medical treatments in cases of exposure?

Most exposures to PAHs happen every day at very low levels in the air we breathe and the foods we eat. Treatment for a short-term exposure is unlikely. Contact your doctor if you experience symptoms of PAHs poisoning.

What levels of exposure have resulted in harmful health effects?

There is no information available from studies on humans to tell what effects can result from being exposed to individual PAHs at certain levels. However, breathing PAHs and skin contact seem to be associated with cancer in humans. Animal studies showed that mice exposed to 308 parts per million (ppm) of PAHs (specifically benzo(a)pyrene) in food for 10 days (short term exposure) caused birth defects. Mice exposed to 923 ppm of benzo(a)pyrene in food for months caused problems in the liver and blood.

Where can I get more information?

Contact your state health or environmental department, or:

Agency for Toxic Substances and Disease Registry
Division of Toxicology
1600 Clifton Road, N.E., E-29
Atlanta, Georgia 30333

References

1. Agency for Toxic Substances and Disease

→ comment = read back

SUMMARY

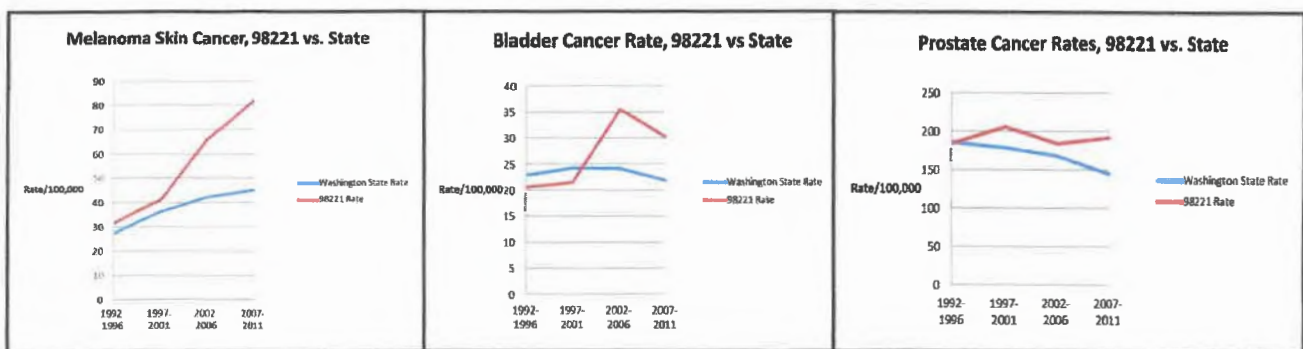
COMMUNITY ENVIRONMENTAL HEALTH ASSESSMENT: WASHINGTON STATE CANCER REGISTRY ANALYSIS OF 98221 RESIDENTS

November 2015

Community Environmental Health Assessment (CEHA) Task Force, Anacortes, WA

The 2013 Washington State Cancer Registry (WSCR, DOH) *Annual Report* revealed that Skagit County had the highest *age-adjusted* bladder cancer rate, and third highest rate of cancer overall, among Washington's 39 counties.¹ Those findings caught the attention of a handful of Anacortes retirees who formed the Community Environmental Health Assessment Task Force (CEHA) and embarked on a two-year investigation of cancer in their community (the 98221 zip code).

Cancer Registry analyses revealed that, compared to Washingtonians, 98221 residents had significantly higher age-adjusted rates of three cancer types during 2007-2011: melanoma skin cancer (82% higher than the State's rate); bladder cancer (38% higher than the State's rate); and prostate cancer (32% higher than the State's rate).



Graphs represent 20 years of cancer incidence data from the Washington State Cancer Registry. *Rate*: new cases per 100,000 residents, adjusted for age differences between the disparate populations. Here, *Washington State cancer rates* exclude 98221 residents

It is possible that the high-incidence cancers amassed here randomly, or are a statistical anomaly. Perhaps our high cancer rates are explained by as-yet-unknown confounding variables (better case reporting, a higher proportion of people of European ancestry, or more Veterans residing in 98221). However, in community with three high-incidence cancers, it is also possible that toxic chemicals in the 98221 biosphere caused or promoted the cancers.

There is great need for continued study to better understand the three high-incidence cancers in our community. In this project's second phase, CEHA will enlist public agencies' help to investigate the following issues:

¹ Skagit County's bladder cancer rate was 41% higher than the State's bladder cancer rate. *Age adjustment* (standardization) is a statistical technique that enables comparisons of disease rates among two groups with dissimilar age distributions. The age-adjusted cancer rates in WSCR data represent the rates that *would have existed* if the (slightly older) 98221 zip code had the same age distribution as Washington State. WSCR's cancer rates are age-adjusted to the 2000 U.S. Standard Population (19 age group) standard. Washington State Cancer Registry, *2008-2010 Washington State residents' annual average incidence & death by county*, Washington State Department of Health (2013). Retrieved from <https://fortress.wa.gov/doh/wscr/WSCR/PDF/10Report/CancerBySiteTables10.pdf>.

stop expansions

- * What agency will conduct a comprehensive Community Environmental Health Assessment for the 98221 zip code, so that we better understand the (1) health status of our children, adults, and refinery workers (incidences of respiratory, cardiovascular, neurological and reproductive diseases, as well as cancers), (2) the distribution pattern of our cancers, (3) our community's historic and current sources of industrial pollution, as well as (4) the cause(s) of 98221 residents' high cancer rates?
 - The CEHA Task Force calls for Ecology to investigate the potential public health hazards and cleanup options for the following: Fidalgo Bay waters and seafood, Fidalgo Bay beaches, Shell's former Tank Farm (downtown), and Shell & Tesoro Tank Farms on March Point.
- * Good public health requires good data, but Agencies rely on incomplete self-reported refinery data (and computer simulations) to determine air quality and refinery compliance. Last year, residents experienced a four-hour toxic refinery plume on a 2015 weekend, with no way to get information about health hazards. Given the "High Priority Violator" status of Anacortes refineries, the CEHA Task Force calls for the installation of an accurate, real-time air monitoring system, which residents can access 24/7 to make sound judgements about health precautions their families and outdoor pets/livestock.
- * Given Anacortes refineries (1) generate 90% of the Hazardous Air Pollutants in 98221, (2) habitually violate public and environmental health laws, and (3) provide the incomplete, inaccurate emissions data upon which agencies determine "air quality," the CEHA Task Force calls for an accurate air quality analysis in our refinery fence-line community.
 - Do agencies monitor toxic emissions from oil tanker cars at the current (Tesoro) unloading facility? FLIR (infrared) cameras have recorded large volumes of (invisible) gaseous chemicals billowing from oil tank cars. Has NWCAA investigated VOC leaks from oil-trains and/or refinery infrastructure? Similarly, do agencies monitor carcinogenic diesel emissions from Ocean Going Vessels idling at our Port?
 - Given that refineries regularly violate health and safety laws, why don't agencies aggressively enforce federal, state and local laws, as well as make polluters pay to clean up hazardous waste sites?
 - As a policy, NWCAA does not levy maximum fines for refinery safety violations. The CEHA Task Force calls on the State to investigate why agencies do not protect the health, safety and welfare of people and the environment;
 - If agencies cannot fulfill the duty of protecting public and environmental health, what steps should Anacortes take to swiftly end illegal industrial discharges of petrochemicals, poisonous gaseous chemicals, particulate matter, toxins and carcinogens into our biosphere, risking our kids' health, lives, and futures?
 - Agencies must remove barriers to citizen reporting of chemical odors and plumes. Any person willing to sign an affidavit should be able to (1) easily file a report and (2) receive agency feedback about their concerns.
 - To ensure agencies fulfill their key duty and responsibilities—protecting the health, safety and welfare of the public and environment by enforcing laws—agency board members must understand the intent and terms of federal, state and local public safety and environmental laws, as well as agency *Operating Permits*.
 - Given that Anacortes refineries regularly, unlawfully discharge toxins and carcinogens into the biosphere—making them *prohibited uses* in the Anacortes Heavy Manufacturing District—the CEHA Task Force calls for a moratorium on refinery expansions;
 - The CEHA Task Force calls for a full-time "sustainability coordinator," under the Mayor, to help realize Anacortes residents' 20-year vision: *A Sustainable Environment & Economy*;
 - Given the high incidence of melanoma, bladder cancer and prostate cancer in our community, do public health professionals recommend a community cancer-prevention program?
 - Should the City and County post public health warnings about contaminated seafood and beaches around Fidalgo Bay?

Clean Air agency alleges multiple failures by Shell chemical release

Posted: Tuesday, April 12, 2016 10:48 am

Updated to add Swinomish response:

Shell Puget Sound Refinery allegedly took shortcuts in shutting down and decontaminating its east flare system, leading to the release of chemicals on Feb. 20, 2015, that affected hundreds of people, according to a press release Tuesday from Northwest Clean Air Agency.

“This incident sickened many people in the community, and people felt unsafe in their homes and at work,” said Mark Asmundson, Northwest Clean Air executive director.

NWCAA mailed a notice of violation to the Shell refinery April 8.

The Swinomish Indian Tribal Community said it was pleased the the air agency issued a notice of violation and acknowledged the significant impact on the local community of the chemical release.

The statement by Chairman Brian Cladoosby was made in an April 12 press release from the Swinomish community.

“The Tribe takes seriously its stewardship of the reservation environment and the protection of the health of reservation residents” Cladoosby said in the Swinomish release. “The tribe immediately reached out to Shell, environmental regulators, and the entire reservation community in order to determine the impacts of this potential environmental disaster.”

The tribe received 176 written statements and numerous oral reports, and aggregate data from this effort was shared with the air agency as part of its investigation into the incident, it said.

“Numerous reservation residents were impacted and suffered immediate and severe symptoms after being exposed to the noxious plume,” according to the Swinomish release. “Migraines, nausea, eye irritation, throat irritation/coughing and breathing problems were the most common symptoms reported.”

Shell has 30 days to respond to the notice of violation mailed on April 8 before any penalty is determined.

EPA files complaint against Tesoro Anacortes Refinery

The U.S. Environmental Protection Agency has filed a complaint against the Tesoro Anacortes Refinery and has proposed \$718,361 in fines for alleged failures to comply with federal safety regulations.

ANACORTES — The U.S. Environmental Protection Agency announced Wednesday it has filed a complaint against the Tesoro Anacortes Refinery and has proposed \$718,361 in fines for alleged failures to comply with federal safety regulations.

According to the EPA news release, two inspections in 2011 revealed violations of federal chemical accident prevention and emergency planning rules.

Ed Kowalski, director of the EPA's Office of Compliance & Enforcement in Seattle, said in the release the violations are unacceptable.

"There's no room for error when you're processing this volume and mix of chemicals," he said. "Petroleum refiners and their workers must understand and carefully follow regulations designed to protect people, our communities and our environment from potentially catastrophic accidents."

In a written statement, refinery officials said the company is "fully committed to the safety of its employees and the surrounding community" and plans to defend itself against the allegations.

The EPA has authority under the federal Clean Air Act to regulate harmful air emissions and set prevention requirements.

Using that authority, the federal agency requires facilities considered stationary sources of air emissions, such as oil refineries, to have plans in place under a Risk Management Program.

At the Tesoro refinery, eight processes handling more than 10,000 pounds of regulated, flammable substances are covered under the Risk Management Program.

For each of those processes, the refinery is supposed to submit a plan, develop a management system and conduct a hazard assessment, according to the complaint.

According to the EPA, seven violations were identified in the refinery's plan during inspections in January 2011 and October 2011.

The agency found missing or inadequate components in the safety information, hazard analysis, operating procedures, mechanical integrity and compliance audit portions of the plan, according to the EPA complaint.

The EPA also alleges some information was not adequately accessible to refinery employees.

The refinery has 30 days to respond to the complaint, according to EPA documents.

The Anacortes refinery is one of six the Tesoro Corporation operates in the western U.S., including Alaska. The Anacortes facility has a 120,000 barrel-per-day capacity.

The refinery has about 350 employees and produces a variety of petroleum products primarily sold in Washington and Oregon, according to the EPA.

The company has proposed expanding its product line to include xylene — a component of crude oil that can be extracted and used to manufacture such items as polyester materials.

Under the state environmental policy act, Skagit County Planning and Development is working on an environmental impact statement for the proposal.

Plum Rios
Kimberly
Adrian — Smith
De — James
letter
JAMES
TIMING
[Signature]

Anacortes refinery fined \$77,000 for workplace violations following toxic release



November 20, 2015

→ failed to implement safe work practices
Sent 9 Swinomish community members to hospital

Tumwater – Shell Oil Products is facing \$77,000 in fines from the state Department of Labor & Industries (L&I) for workplace health violations after an investigation into an uncontrolled toxic release last February.

L&I began the investigation at Shell's Puget Sound Refinery in Anacortes after learning of an incident during which the refinery's main flare released contaminants into the environment. The release prompted numerous odor complaints from the community nearby.

A refinery flare is a disposal system that burns off waste gases and vapors that cannot be used during production. It's also a safety device that can help prevent fires or explosions during power outages or other emergencies. The flare must be decontaminated and shut down periodically for maintenance.

The investigation found that the company had skipped critical decontamination steps while shutting down the main flare for routine maintenance. Failing to implement safe work practices caused an uncontrolled release that exposed workers to toxic substances including mercaptans, hydrogen sulfide, hydrocarbons and pyrophoric iron.

The company was also cited in 2013 for skipping critical steps when shutting down the flare. In that case, there was an explosion that nearly injured several contractors and Shell employees.

For the recent incident, Shell Oil Products was cited for one willful violation and fined the maximum of \$70,000 for knowingly and intentionally not following safe work practices for the control of hazards when shutting down the flare.

The company was also cited for one serious violation with a penalty of \$7,000 for giving workers the incorrect procedure for shutting down the flare.

A willful violation can be issued when L&I has evidence of plain indifference, a substitution of judgment or an intentional disregard to a hazard or rule. A serious violation exists if there is a substantial probability that worker death or serious physical harm could result from a hazardous condition.

Over the last three years, L&I has responded to several complaints that resulted in 11 inspections at the refinery.

The employer has 15 working days to appeal the citation. Penalty money paid as a result of a citation is placed in the workers' compensation supplemental pension fund, helping workers and families of those who have died on the job.

###

For a copy of the citation, please contact L&I Public Affairs at 360-902-5413.

For media information: Elaine Fischer, 360-902-5413, or Elaine.Fischer@lni.wa.gov.

Connect with L&I: Facebook (facebook.com/laborandindustries) and Twitter (twitter.com/lniwa)

Broadcast version:

Shell's Puget Sound Refinery is facing \$77,000 in fines from the state Department of Labor & Industries for workplace health violations following an uncontrolled toxic release last February. The refinery's main flare released contaminants into the environment, prompting numerous odor complaints from the community nearby.

Shell was cited for one willful violation and fined the maximum of \$70,000 for intentionally not following safe work practices when shutting down the flare. The company was also fined \$7,000 for giving workers the incorrect procedure for shutting down the flare. Shell was previously cited in 2013 for skipping critical steps that caused an explosion that nearly injured nearby workers. The employer has 15 working days to appeal the citation.



Shell Oil Products US

Puget Sound Refinery

P.O. Box 622

Anacortes, WA 98221

Tel 360.293.0800

Fax 360.293.0808

Email pugetsound@ShellOPUS.com

Web-Plant www.shellpugetsoundrefinery.com

Web-Corporate www.shellus.com

*found online
Shell's explanation
of toxic release*

April 10, 2015

CERTIFIED MAIL RETURN RECEIPT REQUESTED
7013 2250 0001 8744 0415

Mr. Dan Mahar
NWCAA
1600 South Second Street
Mount Vernon, WA 98273

Dear Mr. Mahar:

Subject: Odor Event Emissions Estimates

Shell Puget Sound Refinery is submitting the emissions estimates found in Attachment 1 as a follow-up to the Excess Emissions Report submitted to your office on March 30, 2015.

Contact Mr. Tim Figgie at 293-1525 if you have any questions related to this information.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this letter are true, accurate, and complete.

Sincerely,

SHELL PUGET SOUND REFINERY

Shirley Yap
General Manager

TCF

Cc: Air Toxics Coordinator – Office of Air Quality
US-EPA Region 10
1200 Sixth Ave
Seattle, WA 98101

Attachment 1
Emission Estimation Methodology

Online sulfur instrumentation on the East Flare had been isolated from service to avoid water damage prior to the odor release incident that occurred on February 20, 2015¹. Therefore, emissions from the flare that occurred during the flare decontamination process were estimated based on available information regarding the composition of components in the flare Knock Out (KO) drum. A process flow dynamic simulation of the flare system from the KO drum to the flare tip was constructed using Unisim simulation software. This simulation utilized the physical characteristics of Puget Sound flare system and process operating information provided by plant personnel and process control instrumentation. The output from the simulation was an estimate of the flow and chemical composition of the gas going to the flare tip.

The chemical composition of the flare gas derived from the dynamic simulation model was then used in a combustion efficiency model cited in peer review comments of the US EPA paper, "Parameters for Properly Designed and Operated Flares" (April 2012)².

Combustion efficiencies were calculated on a minute-by-minute basis during the east flare odor event. These minute-by-minute combustion efficiencies were then applied to the dynamic simulation flow and composition estimates to obtain estimates of emissions leaving the flare tip. These data are listed in Table 1 below and are total emissions for the release period from 12:50 PM to 4:18 PM on February 20, 2015.

Table 1

Estimated Emissions

H2S	Methyl mercaptan	Ethyl mercaptan	Propyl mercaptan	Dimethyl sulfide	Benzene	VOC	Methane, ethane, & hydrogen	SO2
lbs	lbs	lbs	lbs	lbs	lbs	lbs	lbs	lbs
2.3	65.6	16.2	4.4	17.9	0.9	127.7	471.0	114.5

Reportable Quantities for the above compounds, in LBS, per 40 CFR 302.

100	100	N/A	N/A	N/A	10	N/A	N/A	500
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¹ The online sulfur instrumentation on the flare line had been isolated when steam was added to the flare line. This was done to protect the instrument from water damage. At the time the sulfur instrumentation was isolated from service, the east flare line had been blocked in from the main flare header and flare gas recovery so that no process flow could reach the east flare.

² The combustion efficiency expression suggested by Reviewer B of this paper was utilized to estimate combustion efficiency.



NOTICE OF VIOLATION REPORT

1989-2009

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-1990 AND Jan-1-2010

Order of Approval [to Construct]

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
9/20/1993	4/11/1989	2286	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Section 301.1: Within 60 days of receipt of a complete "Notice of Construction and Application for Approval", or as promptly as possible after the close of the public comment period if subject to the public notice requirements of Section 300 of this Regulation, the Board of Control Officer shall issue an Order of Approval or an Order to Prevent Construction. A person seeking approval to construct or modify a source that requires an operating permit may elect to integrate review of the operating permit application or amendment required by Section 322 of this Regulation provided that any such application shall be processed in accordance with the operating permit program procedures and deadlines. Section 301.2: Failure to identify all known, available and reasonable air pollution control measures for particulate emissions. Description: Fluidized Catalytic Cracking Unit - Puget Sound Plant.	7/14/1994	\$730,640	\$376,140
8/8/1994	8/2/1994	2389	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Description: Exceeded the 5 minute 0.800 ppm ambient SO2 standard (measured by station 32) for the second time in less than 12 months.	9/21/1994	\$2,500	\$0
9/16/1994	9/2/1994	2404	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Description: Exceeded the 0.800 ppm 5 minute ambient sulfur dioxide standard (as measured by station 32) for the third time in a twelve month period.	11/2/1994	\$5,000	\$0



NOTICE OF VIOLATION REPORT

Serving Island, Skagit & Whatcom Counties

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-1990 AND Jan-1-2010

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: Description: Failure to report upset within 12 hours.			
1/9/1997	12/26/1996	2704	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Description: Release of sulfur emissions in such quantity and duration as to unreasonably interfere with the use and enjoyment of life and property.	3/12/1997	\$500	\$0
5/5/1997	4/18/1997	2736	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: <i>Stat of perf order of approval</i> Section 302: Failure to comply with order of approval conditions. 40 CFR 60.104(a)(2)(i): NSPS Subpart J - (a) No owner or operator subject to the provisions of this subpart shall: (2) Discharge or cause the discharge of any gases into the atmosphere from any Claus Sulfur Recovery plant containing in excess of (i) For an oxidation control system or a reduction control system followed by incineration, 250 ppm by volume (dry basis) of SO2 at zero percent excess air. (6/24/08). Description: Operator error when working on DEA system at sulfur plant causing a loss of DEA. The NSPS 12 hour standard of 250 ppm SO2 was exceeded from noon to midnight on 4/18/97.	6/10/1997	\$500	\$0
8/22/1997	8/14/1997	2768	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	9/22/1997	\$500	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-1990 AND Jan-1-2010

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
11/13/1998	10/10/1998	2904	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: 40 CFR 63.422(c)(2)(i): (c) Each owner or operator of a bulk gasoline terminal subject to the provisions of this subpart shall comply with §60.502(e) of this chapter as follows: (2) Section 60.502(e)(5) of this chapter is changed to read: The terminal owner or operator shall take steps assuring that the nonvapor-tight gasoline cargo tank will not be reloaded at the facility until vapor tightness documentation for that gasoline cargo tank is obtained which documents that: (i) The gasoline cargo tank meets the applicable test requirements in §63.425(e); 40 CFR 63.650(a): Except as provided in paragraphs (b) through (c) of this section, each owner or operator of a gasoline loading rack classified under Standard Industrial Classification code 2911 located within a contiguous area and under common control with a petroleum refinery shall comply with subpart R, §§63.421, 63.422(a) through (c), 63.425(a) through (c), 63.425(e) through (h), 63.427(a) and (b), and 63.428 (b), (c), (g)(1), and (Description: Failure to assure that gasoline cargo tanks tested by Beall and General Transport were leak tight in accordance with requirements under Refinery MACT.	12/18/1998	\$500	\$0
12/21/1998	11/29/1998	2915	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Description: Exceeded the 0.800 ppm 5-minute SO ₂ average for the fifth time in a twelve month period (as measured by General Chemical's ambient station). Winds were from 162 degrees at 7 miles per hour.	2/3/1999	\$11,225	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-1990 AND Jan-1-2010

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
11/24/1999	11/18/1999	3007	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Section 301.1: Within 60 days of receipt of a complete "Notice of Construction and Application for Approval", or as promptly as possible after the close of the public comment period if subject to the public notice requirements of Section 300 of this Regulation, the Board of Control Officer shall issue an Order of Approval or an Order to Prevent Construction. A person seeking approval to construct or modify a source that requires an operating permit may elect to integrate review of the operating permit application or amendment required by Section 322 of this Regulation provided that any such application shall be processed in accordance with the operating permit program prodedures and deadlines. Description: Sulfur dioxide emissions in excess of 1000 ppmv from the CO Boiler stacks between 9:00 and 10:00 PM 11/18/99.	1/7/2000	\$500	\$0
5/11/2000	4/5/2000	3038	Y	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Section 301.1: Within 60 days of receipt of a complete "Notice of Construction and Application for Approval", or as promptly as possible after the close of the public comment period if subject to the public notice requirements of Section 300 of this Regulation, the Board of Control Officer shall issue an Order of Approval or an Order to Prevent Construction. A person seeking approval to construct or modify a source that requires an operating permit may elect to integrate review of the operating permit application or amendment required by Section 322 of this Regulation provided that any such application shall be processed in accordance with the operating permit program prodedures and deadlines. Description: Failure to abide by Condition 3 of Order of Approval to Construct #684		\$0	\$0
1/18/2001	1/9/2001	3133	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	3/8/2001	\$2,000	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-1990 AND Jan-1-2010

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
1/29/2002	1/24/2002	3218	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Description: Carbon monoxide source test failure: source test performed on 9/25/01 resulted in an exceedance (3.7 lbs CO/hour) of the 3.2 lbs CO/hour limit set forth in OAC #762 Condition 2b.	4/3/2002	\$1,000	\$1,000
2/11/2003	1/25/2003	3302	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: AOP 5.8.7: 40CFR 63.1568(a)(1) Owner/operator shall not discharge gases into the atmosphere from any Claus sulfur recovery unit plant containing in excess of 250 ppmvd @ 0% O2 based on a 12-hour rolling average Description: Improper operation of the Tail Gas Treating Unit (TCTU) resulting in SO2 emissions from the primary incinerator stack (16F-108) to exceed 250 ppm for twelve consecutive 12-hour rolling average periods.	3/31/2003	\$1,000	\$0
7/15/2003	3/6/2003	E03-05	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Description:		\$0	\$0
7/7/2003	3/19/2003	3329	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	9/8/2003	\$4,500	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

Source = "Shell Puget Sound Refinery" And Issued Date Between Jan-1-1990 AND Jan-1-2010

Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: AOP 4.14: No person shall discharge from any source quantities of air contaminants, with the exception of odors as addressed in Section 535, in sufficient amounts and of such characteristics and duration as is likely to be injurious or cause damage to human health, plant, or animal life, or property; or which unreasonably interferes with enjoyment of life and property. AOP 4.18: It shall be unlawful for any person to cause or permit the emission of particulate matter which becomes deposited upon the property of others in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with use and enjoyment of life and property. AOP 4.19: Fallout: No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere u Description: Nuisance particulate fallout (catalyst) caused during FCCU startup..			
8/13/2004	7/21/2004	3429	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: AOP Term 5.5.4: NSPS 40 CFR 60.105(a)(3)(ii): The SO2 monitoring level equivalent to the H2S standard under 40 CFR 60.104(a)(1) shall be 20 ppm (dry basis, zero percent excess air) AOP Term 5.7.3: NSPS 40 CFR 60.105(a)(3)(ii): The SO2 monitoring level equivalent to the H2S standard under 40 CFR 60.104(a)(1) shall be 20 ppm (dry basis, zero percent excess air) Description: On June 21, 2004, applicable emission limits were exceeded as a result of careless operating practices related to backflushing the 6D-E5 debutanizer overhead condensers. The resulting excess emissions are judged to have been reasonably preventable. Note: AOP term 5.5.4 relates to emissions at Catalytic Reformer #1, and AOP term 5.7.3 relates to emissions at Hydrotreater Unit #1. The 20 ppm emission limit was exceeded at both units.	10/13/2004	\$2,000	\$0
9/1/2004	7/22/2004	3431	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	10/26/2004	\$6,300	\$0



Serving Island, Skagit & Whatcom Counties

NOTICE OF VIOLATION REPORT

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Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
6/13/2006	7/6/2005	3542	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: AOP Term 5.10.4: 40 CFR 63.650(a): Emissions to the atmosphere from the vapor collection and processing system shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded. AOP Term 5.10.12: 40 CFR 63.650(a): Equipment shall be operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm water) during product loading and pressure-vacuum vent shall not begin to open at a system pressure less than 4,500 pascals. AOP Term 3.3.6: 40 CFR 63.6(e): At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. AOP 4.1 (9/24/04): NWCAA 342.1: Sources are required to keep process and/or air pollution control equipment in good operating condition. Description: On July 6, 2005. Shell Puget Sound Refinery performed a required test of emissions from the truck rack combustor and failed to demonstrate compliance with the applicable standard. On September 22, 2005. Shell Puget Sound Refinery retested the unit and again failed to demonstrate compliance with the applicable standard. Results from the tests indicate a period of continuous noncompliance from July 6, 2005 to September 22, 2005. Insufficient maintenance of the combustor inlet air louvers contributed to the poor performance of the unit. Maintenance issues related to the louvers was also a contributing factor in a recent, similar violation at the combustor (see NWCAA NOC 3329 dated 3/19/2003).	8/8/2006	\$112,000	\$84,000
3/23/2006	12/19/2005	3519a	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: AOP 4.19: Emissions detrimental to persons or property. No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business (9/25/04).	5/3/2006	\$2,000	\$0



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Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: NWCAA Regulation Section 300.15: It shall be unlawful for an owner or operator of a source or emission unit to not abide by the operating and reporting conditions in an Order of Approval. AOP 4.1 (9/24/04): NWCAA 342.1: Sources are required to keep process and/or air pollution control equipment in good operating condition. AOP 5.12.3: Design and operate waste management units in accordance with appropriate standards. 40 CFR 61 Subpart FF 61.340 - 51.358 applies directly. AOP 5.12.8: The Oil/Water Separator shall be subject to NWAPA 580.2 and 40 CFR Subpart QQQ. AOP 3.2.7: The owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice for minimizing emissions. Description: A gap inconsistent with 40 CFR 61.347(a), which requires coverage with either a fixed roof or a floating roof, was found in an area of the API Oil/Water Separator at the Shell Puget Sound Refinery.			
5/21/2007	1/12/2007	3599	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: NWCAA Regulation Section 300.15: It shall be unlawful for an owner or operator of a source or emission unit to not abide by the operating and reporting conditions in an Order of Approval. AOP 5.8.15: NWCAA OAC #828 Condition 4 (5/5/03) 40 CFR 60.104(a)(2), 60.105(a)(5) and 60.105(e)(4)(i) (10/17/00) Sulfur dioxide emissions from sulfur recovery unit incinerator stacks shall not exceed 250 ppmvd @ 0% oxygen based on 12-hour rolling average. AOP 5.7.7: 40 CFR 60.104(a)(1): Fuel gas limited to 162-ppmvd hydrogen sulfide based on 3-hour rolling average. (Charge Heater 11H-101) AOP 5.7.11: 40 CFR 60.104(a)(1): Fuel gas limited to 162 ppmvd hydrogen sulfide based on 3-hour rolling average. (11H-102 and 1H-103 Heaters) PSR AOP 4.11: WAC 173-400-040(6): Sulfur compounds calculated as sulfur dioxide and corrected to 7% oxygen emitted greater than 1000-ppmvd for a sixty consecutive minute period are prohibited.	7/19/2007	\$5,000	\$0



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Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Cited Regulations: AOP 5.12.4: 40 CFR 61.347(c): Except as provided in 61.350 of this subpart, when a broken seal or gasket or other problem is identified, or when detectable emissions are measured, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification. 40 CFR 61 Subpart FF 61.340 - 51.358 applies directly. AOP 5.12.3: Design and operate waste management units in accordance with appropriate standards. 40 CFR 61 Subpart FF 61.340 - 51.358 applies directly. AOP 5.12.6: Design Effluent Plant to operate with no detectable emissions. 40 CFR 61 Subpart FF 61.340 - 51.358 applies directly. Description: Quarterly Benzene Waste Operations NESHAP reports from Shell-PSR have historically included only requirements of 61.357(d)(6) and have not addressed the requirements of 61.357(d)(7). As such, these reports have been incomplete.			
8/6/2008	7/26/2007	3695	N	Y	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: AOP 4.1 (9/24/04): NWCAA 342.1: Sources are required to keep process and/or air pollution control equipment in good operating condition. AOP 5.8.15 (9/24/04): NWAPA OAC #828 Condition 4 (5/5/03); 40 CFR 60 Subpart J: 40 CFR 60.104(a)(2), 60.105(a)(5) and 60.105(e)(4) (i) (10/17/00). NSPS Subpart J SRU SO2. Incinerator stacks shall not exceed 250 ppmvd @ 0% O2 based on 12-hour rolling average. AOP 5.8.19 (9/24/04): NESHAP Subpart UUU - 40 CFR 63.1568(a)((1) - Sulfur Recovery Units (a) What emission limitations and work practice standard must I meet? You must: (1) Meet each emission limitation in Table 29 of this subpart that applies to you. If your sulfur recovery unit is subject to the NSPS for sulfur oxides in Sec. 60.104 of this chapter, you must meet the emission limitations for NSPS units (4/11/02).	3/24/2009	\$5,000	\$0



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Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
8/6/2008	3/1/2008	3703	N	Y	<p>Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221</p> <p>Cited Regulations: AOP 4.1 (9/24/04): NWCAA 342.1: Sources are required to keep process and/or air pollution control equipment in good operating condition. AOP 5.8.15 (9/24/04): NWAPA OAC #828 Condition 4 (5/5/03); 40 CFR 60 Subpart J: 40 CFR 60.104(a)(2), 60.105(a)(5) and 60.105(e)(4) (i) (10/17/00).</p> <p>NSPS Subpart J SRU SO2. Incinerator stacks shall not exceed 250 ppmvd @ 0% O2 based on 12-hour rolling average. AOP 5.8.19 (9/24/04): NESHAP Subpart UUU - 40 CFR 63.1568(a)((1) - Sulfur Recovery Units (a) What emission limitations and work practice standard must I meet? You must: (1) Meet each emission limitation in Table 29 of this subpart that applies to you. If your sulfur recovery unit is subject to the NSPS for sulfur oxides in Sec. 60.104 of this chapter, you must meet the emission limitations for NSPS units (4/11/02).</p> <p>Description: On March 1, 2008 at approximately 6:00 am, excessive venting of vapors to the Sulfur Recovery Unit #4 incinerator caused the incinerator sulfur dioxide (SO2) emission concentration to exceed the 250 ppmv at 0% O2 limit on a 12-hour rolling average. The event was a result of fouled trays in the SRU4 wastewater stripper exacerbated by an increased reflux rate and was reasonably preventable.</p>	1/14/2009	\$4,000	\$0



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Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					Description: On June 27, 2008, Sulfur Recovery Unit (SRU) 3 was in startup mode and was having difficulties that required it be shutdown. In response, the Operator inadvertently shut down SRU4 rather than SRU3. This event is a result of careless, poor, or inadequate operation and, hence, was reasonably preventable.			
8/18/2009	6/2/2009	3783	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 Cited Regulations: Section 535.1: Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gasses emitted into the atmosphere to a reasonable minimum. Section 535.3: Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practices and control equipment to reduce these odors to a reasonable minimum. Section 535.4: Odor emissions detrimental to persons or property. No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. AOP 4.17: WAC 173-400-040(4); Odor. Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice Description: Release of odorous substances from the wastewater treatment plant in such concentrations and of such duration as to be detrimental to the health, safety, or welfare of any person, cause damage to property or business, or unreasonably interfere with any other property owner's use and enjoyment of his or her property. Appropriate and recognized good practices, procedures, and control equipment shall be used, installed, and operated to reduce odor-bearing gases emitted into the atmosphere to a reasonable minimum. Odor nuisance impacts documented at complainant's residence in the 8200 block of State Route 20 in Anacortes.	10/27/2009	\$7,000	\$0
8/18/2009	7/2/2009	3784	N	N	Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221	10/27/2009	\$7,000	\$0



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Date Issued	Date Occured	NOV	WRN	HPV	Source	Date Penalty Assesed	IOP Amount	Suspended
					<p>Cited Regulations: Section 535.1: Appropriate practices and control equipment shall be installed and operated to reduce odor-bearing gasses emitted into the atmosphere to a reasonable minimum. Section 535.3: Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practices and control equipment to reduce these odors to a reasonable minimum. Section 535.4: Odor emissions detrimental to persons or property. No person shall cause or permit the emission of any odorous air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. AOP 4.17: WAC 173-400-040(4); Odor. Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice</p> <p>Description: Release of odorous substances from the wastewater treatment plant in such concentrations and of such duration as to be detrimental to the health, safety, or welfare of any person, cause damage to property or business, or unreasonably interfere with any other property owner's use and enjoyment of his or her property. Appropriate and recognized good practices, procedures, and control equipment shall be used, installed, and operated to reduce odor-bearing gases emitted into the atmosphere to a reasonable minimum. Odor nuisance impacts documented at complainant's residence/business in the 8600 block of South March Point Road.</p>			

Total: \$1,190,090 \$474,140

#of NOV's: 47

of Warnings: 4

of HPV's: 11

Info Sheet for Annual March Point Rally to Fall Battering 2017 Protest Tesoro

FACT SHEET ON MARCH POINT

- ➔ • March Point is unceded Swinomish territory. It was part of the Swinomish Reservation boundaries, as agreed to in the Treaty of Point Elliott in 1855. But in 1873, March Point was arbitrarily taken away from the tribe by President Ulysses Grant.
- There are two large oil refineries: Tesoro (recently changed their name to Andeavor) and Shell. These two account for about 40% of the oil refining in Washington and Oregon.
- Both refineries get oil by ship and by pipeline. Tesoro also receives unit oil trains, while Shell receives small shipments of crude by rail.
- Oil brought in by ship used to be predominantly from Alaska, but in recent years is increasingly from a variety of places around the world.
- Tesoro has also been shipping crude oil out from their refinery. In the first half of 2017 they shipped more than a million barrels of crude oil out of Washington state.

Kinder Morgan and the Puget Sound Pipeline

- Oil by pipeline brought to March Point comes through the Puget Sound Spur of the Kinder Morgan Trans Mountain Pipeline, which originates in Alberta, Canada. Much of the oil produced in Alberta is bitumen, also called tar sands. Tar sands oil is some of the dirtiest, most destructive petroleum anywhere on Earth.
- Toxic effluent from tar sands operations are linked to high concentrations of rare cancers among the nearby First Nations and decimation of wildlife including caribou herds.
- Kinder Morgan has proposed a tripling of the capacity of their Trans Mountain Pipeline. If approved, they could export an additional 595,000 bpd through the Salish Sea, increasing the tar sands tanker traffic through our waterways by 700%. Tar sands oil sinks in water, so there is no way to clean up a spill.
- Kinder Morgan has also told investors that they might double the Puget Sound pipeline spur's capacity across the border, increasing the amount of tar sands shipped to Cherry Point and March Point.
- The Trans Mountain project is approved by the Canadian federal government but is opposed by First Nations all along the pipeline route. Several First Nations (including the Squamish, Tsleil-Waututh, Upper Nicola Band and the Coldwater Band) are fighting to stop this terrible project in court right now (the case started last Monday, October 2). A very similar case ultimately stopped the proposed Enbridge Northern Gateway pipeline from being built in northern BC.

Oil Trains

- Tesoro's oil trains are mostly carrying Bakken oil, the highly volatile fracked shale oil from North Dakota. Oil trains are incredibly dangerous. In 2013, 47 people were killed when a runaway oil train derailed and exploded in the small town of Lac Megantic in Quebec. Last summer an oil train derailed and caught fire in the Columbia Gorge in the town of Mosier, Oregon only a few hundred yards away from an elementary school.
- Tesoro currently receives about 6 trains per week. Each has about 100 tank cars, or 3 million gallons.

FACT SHEET ON MARCH POINT

- The Swinomish have a legal appeal pending based on BNSF exceeding a 25 train cars per day limitation in BNSF's existing agreement with the Swinomish to operate a rail spur on tribal lands.
- The original permit application from Tesoro for the oil by rail facility stated "The project is intended to provide the additional flexibility of receiving crude oil by rail and will be designed to accommodate one loaded 100 car unit train every other day."
- Shell tried to build a terminal to receive oil trains too. They were stopped because the public insisted on a full environmental review, and when forced to disclose the harm their project would cause the community, Shell gave up.

Xylene

- Over the past few years, Washington State is using less gasoline and less diesel. Local oil refining companies are planning for a future where we don't need what they are selling, so Tesoro is trying to diversify to different petrochemical products.
- Tesoro has proposed a 15,000 barrel per day xylene expansion which they call the "Clean Products Upgrade Project." Xylene is a highly toxic, volatile and flammable petrochemical used in making plastics.
- To produce xylene, they will need to bring in a chemical called reformat from other refineries on barges, process it, then send the finished xylene to Asia by ship. The project would add about 120 vessel trips to and from March Point each year.
- There is a public hearing on the permit on November 2 in Mount Vernon. It is in front of the same hearings examiner who forced Shell to do a full environmental review of the oil trains project. **With public participation that highlights the very real impacts of xylene production and transport, we can stop this project.**

Refinery workers

- The union that represents the workers at these refineries - the United Steelworkers - has been active in the Alliance for Jobs and Clean Energy, and is helping to work toward putting a price on carbon.
- The workers are not easy allies in the fight for climate justice, but they can be important allies. After all, we share more interests with them, than they share with the managers of the oil companies.
- Some of the union leaders have recently expressed interest in having better dialog with members of the Swinomish Indian Nation.
- The organizers of today's event sent a letter to the Steelworkers Union leaders letting them know that we were marching today and reassuring them that it would be peaceful.

Foreword

The Washington State Department of Health (DOH) has prepared this health consultation in cooperation with the Agency for Toxic Substances and Disease Registry (ATSDR). ATSDR is part of the U.S. Department of Health and Human Services and is the principal federal public health agency responsible for health issues related to hazardous waste. This health consultation was prepared in accordance with methodologies and guidelines developed by ATSDR.

The purpose of this health consultation is to identify and prevent harmful human health effects resulting from exposure to hazardous substances in the environment. Health consultations focus on specific health issues so that DOH can respond to requests from concerned residents or agencies for health information on hazardous substances. DOH evaluates sampling data collected from a hazardous waste site, determines whether exposures have occurred or could occur, reports any potential harmful effects, and recommends actions to protect public health. The findings in this report are relevant to conditions at the site during the time of this health consultation, and should not necessarily be relied upon if site conditions or land use changes in the future.

For additional information or questions regarding DOH or the contents of this health consultation, please call the health advisor who prepared this document:

Lenford O'Garro
Washington State Department of Health
Office of Environmental Health Assessments
P.O. Box 47846
Olympia, WA 98504-7846
(360) 236-3376
FAX (360) 236-2251
1-877-485-7316
Website: <http://www.doh.wa.gov/consults>

For persons with disabilities this document is available on request in other formats. To submit a request, please call 1-800-525-0127 (voice) or 1-800-833-6388 (TTY/TDD).

For more information about ATSDR, contact the ATSDR Information Center at 1-888-422-8737 or visit the agency's Web site: www.atsdr.cdc.gov/.

Glossary

Agency for Toxic Substances and Disease Registry (ATSDR)	The principal federal public health agency involved with hazardous waste issues that is responsible for preventing or reducing the harmful effects of exposure to hazardous substances on human health and quality of life. ATSDR is part of the U.S. Department of Health and Human Services.
Cancer Risk	A theoretical risk for developing cancer if exposed to a substance every day for 70 years (a lifetime exposure). The true risk might be lower.
Cancer Risk Evaluation Guide (CREG)	The concentration of a chemical in air, soil or water that is expected to cause no more than one excess cancer in a million persons exposed over a lifetime. The CREG is a <i>comparison value</i> used to select contaminants of potential health concern and is based on the <i>cancer slope factor</i> (CSF).
Cancer Slope Factor	A number assigned to a cancer-causing chemical that is used to estimate its ability to cause cancer in humans.
Carcinogen	Any substance that causes cancer.
Comparison value	Calculated concentration of a substance in air, water, food, or soil that is unlikely to cause harmful (adverse) health effects in exposed people. The CV is used as a screening level during the public health assessment process. Substances found in amounts greater than their CVs might be selected for further evaluation in the public health assessment process.
Contaminant	A substance that is either present in an environment where it does not belong or is present at levels that might cause harmful (adverse) health effects.
Dermal Contact	Contact with (touching) the skin (see route of exposure).
Dose (for chemicals that are not radioactive)	The amount of a substance to which a person is exposed over some time period. Dose is a measurement of exposure. Dose is often expressed as milligram (amount) per kilogram (a measure of body weight) per day (a measure of time) when people eat or drink contaminated water, food, or soil. In general, the greater the dose, the greater the likelihood of an effect. An "exposure dose" is how much of a substance is encountered in the environment. An "absorbed dose" is the amount of a substance that actually got into the body through the eyes, skin, stomach, intestines, or lungs.
Environmental Media Evaluation Guide (EMEG)	A concentration in air, soil, or water below which adverse non-cancer health effects are not expected to occur. The EMEG is a <i>comparison value</i> used to select contaminants of potential health concern and is based on ATSDR's <i>minimal risk level</i> (MRL).

Environmental Protection Agency (EPA)	United States Environmental Protection Agency.
Exposure	Contact with a substance by swallowing, breathing, or touching the skin or eyes. Exposure may be short-term [acute exposure], of intermediate duration, or long-term [chronic exposure].
Groundwater	Water beneath the earth's surface in the spaces between soil particles and between rock surfaces [compare with surface water].
Hazardous substance	Any material that poses a threat to public health and/or the environment. Typical hazardous substances are materials that are toxic, corrosive, ignitable, explosive, or chemically reactive.
Ingestion	The act of swallowing something through eating, drinking, or mouthing objects. A hazardous substance can enter the body this way [see route of exposure].
Ingestion rate (IR)	The amount of an environmental medium that could be ingested typically on a daily basis. Units for IR are usually liter/day for water, and mg/day for soil.
Inhalation	The act of breathing. A hazardous substance can enter the body this way [see route of exposure].
Inorganic	Compounds composed of mineral materials, including elemental salts and metals such as iron, aluminum, mercury, and zinc.
Lowest Observed Adverse Effect Level (LOAEL)	The lowest tested dose of a substance that has been reported to cause harmful (adverse) health effects in people or animals.
Maximum Contaminant Level (MCL)	A drinking water regulation established by the federal Safe Drinking Water Act. It is the maximum permissible concentration of a contaminant in water that is delivered to the free flowing outlet of the ultimate user of a public water system. MCLs are enforceable standards.
Media	Soil, water, air, plants, animals, or any other part of the environment that can contain contaminants.

Volatile organic compound (VOC)	Organic compounds that evaporate readily into the air. VOCs include substances such as benzene, toluene, methylene chloride, and methyl chloroform.
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Table 1. Maximum concentrations of contaminants detected in sediment within Fidalgo Bay in Anacortes, Washington.

Compounds	Maximum Concentration (ppm)	Comparison Value (ppm)	EPA Cancer Class	Comparison Value Reference	Contaminant of Concern (COC)
Arsenic	6.06	20	A	EMEG	No
Cadmium	1.16	10	B1	EMEG	No
Chromium	29.8	200 ⁺⁺	A	RMEG	No
Copper	26.9 J	2,000	D	IM EMEG	No
Lead	12.8	250	B2	MTCA	No
Mercury	0.086	1	D	MTCA	No
Silver	0.159	300	D	RMEG	No
Zinc	59.9	20,000	D	EMEG	No
2-Methylnaphthalene	0.007 J	200		RMEG	No
Acenaphthene	0.003 J	3000		RMEG	No
Acenaphthylene	0.0088 J	2000*	D		No
Anthracene	0.029	20000	D	RMEG	No
Benzo(a)anthracene	0.066	0.62	B2	Region 9	cPAH
Benzo(a)pyrene	0.073	0.1	B2	CREG	cPAH
Benzo (b)fluoranthene	0.1	0.62	B2	Region 9	cPAH
Benzo (k)fluoranthene	0.033	0.62	B2	Region 9	cPAH
Benzo(ghi)perylene	0.033	2000*	D		No
Chrysene	0.11	62	B2	Region 9	cPAH
Dibenz(a,h)anthracene	0.0079 J	0.1**		CREG	cPAH
Dibenzofuran	0.005 J	290	D	Region 9	No
Fluoranthene	0.24	2000	D	RMEG	No
Fluorene	0.0095 J	2000	D	RMEG	No
Indeno(1,2,3-cd)pyrene	0.044	0.62	B2	Region 9	cPAH
Naphthalene	0.019	30000	C	IM EMEG	No
Phenanthrene	0.082	2000*	D		No
Pyrene	0.16	2000	D	RMEG	No
Hexachlorobenzene	0.0011	0.4	B2	CREG	No
2,4-DDT	0.00025 J	30***	B2	IM EMEG	No
4,4-DDD	0.00081 JP	30***	B2	IM EMEG	No
4,4-DDE	0.00043 JP	30***	B2	IM EMEG	No
4,4-DDT	0.0007 JP	30	B2	IM EMEG	No
Alpha-BHC	0.0014 P	0.1	B2	CREG	No
Endosulfan I	0.0028	100		EMEG	No
Endosulfan Sulfate	0.00023 J	100****		EMEG	No

The health benefits of eating fish deserve particular consideration when one is dealing with subsistence consuming populations. Removal of fish from the diet of subsistence consumers can have serious health, social, and economic consequences that must be considered in issuing fish advisories. Consumption advisories for subsistence consumers could therefore, significantly impact diet. Any advice given to fish consumers to reduce the amount of fish they eat based on chemical contamination should attempt to balance the health benefits with the health risks. In general, people should eat fish low in contaminants and high in omega-3 fatty acid. Fish consumption advice should also take into account that eating alternative sources of protein also has risks. For instance, increasing the consumption rate of beef or pork at the expense of eating fish can increase the risk of heart disease. In addition, some contaminants that are common in fish, such as dioxin, might also be present in other meats.

The level of contaminant exposure from fish consumption varies with the species of fish, whole fish or fillet, consumption rate, and preparation and cooking process. Exposure to contaminants in fish can be significantly reduced through simple preparation measures. Simply removing the skin of the fish can reduce PCB exposure [16]. Cooking fish using fillets instead of whole fish can reduce PCB levels by more than 20%. In some cases, PCBs were removed up to 50% through cooking [17, 18].

Chemical Specific Toxicity

The following sections are general summaries of COC health effects. The public health implications of exposure to these COCs from sediments and tissues are discussed later. Copper will not be evaluated, since Bent Nose clams are not usually targeted shellfish species for human consumption. In addition, DOH recommends only Dungeness and Red Rock crab from non-urban areas be consumed and do not eat the “crab butter” (hepatopancreas) and viscera.

Arsenic

Arsenic is a naturally occurring element in the earth's soil. In Washington, normal soil background concentrations rarely exceed 20 ppm [19]. However, the widespread use of arsenic-containing pesticides and the emissions from smelters has resulted in significantly higher levels of arsenic on many properties in the state. There are two forms of arsenic - organic and inorganic. The EPA-established reference dose (RfD) for arsenic is 0.0003 mg/kg/day based on skin color changes and excessive growth of tissue (human data) [20]. EPA classifies the inorganic form of arsenic as a human carcinogen. DOH will not be using the slope factor of 1.5 per mg/kg/day due to the arsenic weight of evidence approach. The recent EPA IRIS review draft for the Science Advisory Board presented a slope factor for combined lung and bladder cancer of 5.7 per mg/kg/day [21]. The slope factor calculated from the work by the National Research Council is about 21 per mg/kg/day [22]. These slope factors could be higher if the combined risk for all arsenic-associated cancers (bladder, lung, skin, kidney, liver, etc.) were evaluated. For this or any other health consultation, DOH will use a slope factor of 5.7 per mg/kg/day, which appears to reflect EPA's Review DRAFT assessment.

Inorganic arsenic is much more harmful than organic arsenic; therefore, DOH based health evaluations on the levels of inorganic arsenic present in fish samples. Generally, inorganic arsenic in fish and shellfish ranged from about 1-20% of total arsenic [20, 22, 23, 24]. The U.S.

Lead poisoning can affect almost every system of the body and often occurs with no obvious or distinctive symptoms. Depending on the amount of exposure a child has, lead can cause behavior and learning problems, central nervous system damage, kidney damage, reduced growth, hearing impairment, and anemia [36].

In adults, lead can cause health problems such as high blood pressure, kidney damage, nerve disorders, memory and concentration problems, difficulties during pregnancy, digestive problems, and pain in the muscles and joints [36]. These have usually been associated with blood lead levels greater than 30 µg/dl.

Because of chemical similarities to calcium, lead can be stored in bone for many years. Even after exposure to environmental lead has been reduced, lead stored in bone can be released back into the blood where it can have harmful effects. Normally this release occurs relatively slowly. However, certain conditions, such as pregnancy, lactation, menopause, and hyperthyroidism can cause more rapid release of the lead, which could lead to a significant rise in blood lead level [37].

EPA's target cleanup goal is no more than 5% of the community with BLLs above 10 µg/dL. Consuming seafood from Fidalgo Bay could result in the estimated BLL for the **general** population, 1.3 to 1.4 percent above 10 µg/dL for a child, and 1.5 to 1.9 percent above 10 µg/dL for an adult with a 95th percentile fetus BLL range of 4.6 to 4.8 µg/dL (see Appendix D, Tables D1 and D6). Consumption of seafood at tribal scenario rates from Fidalgo Bay could result in the estimated BLL, 1.25 to 32.43 percent above 10 µg/dL for a child, and 1.9 to 30.4 percent above 10 µg/dL for an adult with a 95th percentile fetus BLL range of 5.9 to 92.7 µg/dL (see Appendix D, Tables D3, D5, D8 and D10).

Mercury

Mercury exists in the environment in three forms: elemental, inorganic, and organic. Methylmercury is the form of organic mercury related to exposure in fish. Methylmercury is formed from inorganic mercury in the environment by microorganisms in aquatic systems. In the aquatic food chain, methylmercury biomagnifies as it is passed from lower to higher trophic levels through consumption of prey organisms. Fish at the top of the food chain can biomagnify methylmercury, which represents a potential health concern for consumers of fish.

Ingested methylmercury is readily absorbed and complexed with the cysteine amino acid and crosses the blood-brain barrier. In Minamata Bay, Japan, mothers who were exposed to high amounts of mercury but were asymptomatic gave birth to severely affected infants. Other epidemiologic studies have shown developmental effects in both animal and human studies are the primary concern about methylmercury exposure. The EPA established RfD for mercury is 0.0001 mg/kg/day.

Mercury evaluated here represents total mercury as opposed to methylmercury. Dose calculations, however, do not attempt to fractionate the mercury concentrations because almost all of the total mercury found in fish is methylmercury.

Consuming seafood from Fidalgo Bay could result in an exposure dose of 5.59×10^{-6} mg/kg/day (see Appendix B, Table B4) for the general public. Similarly, consuming seafood from Fidalgo

lowest-observed adverse effect level (LOAEL) or a no-observed adverse effect level (NOAEL). In human or animal studies, the LOAEL is the lowest dose at which an adverse health effect is seen, while the NOAEL is the highest dose that does not result in any adverse health effects.

Because of data uncertainty, the toxic effect level is divided by “safety factors” to produce the lower and more protective RfD. If a dose exceeds the RfD, this indicates only the potential for adverse health effects. The magnitude of this potential can be inferred from the degree to which this value is exceeded. If the estimated exposure dose is only slightly above the RfD, then that dose will fall well below the observed toxic effect level. The higher the estimated dose is above the RfD, the closer it will be to the actual observed toxic effect level. This comparison is called a hazard quotient (HQ) and is given by the equation below:

$$HQ = \frac{\text{Estimated Dose (mg/kg-day)}}{\text{RfD (mg/kg-day)}}$$

Estimated exposure doses, exposure assumptions, and hazard quotients are presented in Appendix A for cPAHs found in sediment. Based on exposure estimates quantified in Appendix A, the general population is not likely to experience adverse non-cancer health effects from exposure to chemical contaminants in Fidalgo Bay since the exposure dose did not exceed the RfD.

Similarly, estimated exposure doses, exposure assumptions, and hazard quotients are presented in Appendices B and C for contaminants found in tissue. Based on exposure estimates quantified in Appendix B, the general population is not likely to experience adverse non-cancer health effects from exposure to chemical contaminants in Fidalgo Bay. However, the tribal exposure scenario results in doses that exceed the RfD and in some cases, these exposures fall below the actual toxic effect levels (see Appendix C).

Evaluating Exposure to Lead

The biokinetics of lead are different from most toxicants because it is stored in bones and remains in the body long after it is ingested. Children’s exposure to lead is evaluated through the use of the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IEUBK) developed by the EPA. The IEUBK predicts blood lead levels in a distribution of exposed children based on the amount of lead that is in environmental media (e.g., fish) [40]. It is important to note that the IEUBK model is not expected to accurately predict the blood lead level of a child (or a small group of children) at a specific point in time. In part, this is because a child (or group of children) may behave differently and therefore have different amounts of exposure to contaminated soil and dust than the average group of children used by the model to calculate blood lead levels. For example, the model does not take into account reductions in exposure that could result from community education programs. Despite this limitation, the IEUBK model is a useful tool to help prevent lead poisoning because of the information it can provide about the hazards of environmental lead exposure. For children who are regularly exposed to lead-contaminated fish, the IEUBK model can estimate the percentage of young children who are likely to have blood lead concentrations that exceed a level that may be associated with health problems (usually 10 µg/dl).

of one cancer case per ten thousand persons exposed over a lifetime. A very low estimate might result in one cancer case per several tens of thousands exposed over a lifetime and a slight estimate would require an exposed population of several hundreds of thousands to result in a single case. DOH considers theoretical cancer risk insignificant when the estimate results in less than one cancer per one million exposed over a lifetime. The reader should note that these estimates are for excess cancers that might result in addition to those normally expected in an unexposed population.

Cancer is a common illness and its occurrence in a population increases with the age of the population. There are many different forms of cancer resulting from a variety of causes; not all are fatal. Approximately 1/4 to 1/3 of people living in the United States will develop cancer at some point in their lives [42].

Theoretical cancer risk estimates for exposure to cPAHs in sediments is considered insignificant (2 cancers estimated per 10,000,000 exposed), (see Appendix A, Table A3). Although exposure to cPAHs may occur, the magnitude is likely to be considerably less than the estimated minimum background exposure from sources in food, water, air, sediment, and soil. Many areas of Fidalgo Bay are already under Ecology Agreed Orders. The Orders require an RI/FS be conducted to guide the selection of a cleanup remedy.

Theoretical cancer risk estimates for exposure to seafood by the general population is very low (2 cancers estimated per 100,000 exposed) (see Appendix B, Tables B5). This estimate is within EPA's acceptable risk for fish consumption. However, this is based on bottom fish and shellfish data only. Theoretical cancer risk estimates for exposure to seafood by Tribal consumers range from low to moderate (4 cancers estimated per 10,000 exposed) and moderate to high (2 cancers estimated per 1,000 exposed) (see Appendix C).

Multiple Chemical Exposures

A person can be exposed to more than one chemical through more than one pathway. Exposure to a chemical through multiple pathways occurs if a contaminant is present in more than one medium (i.e., air, soil, surface water, groundwater, and sediment). For example, the dose of a contaminant received from drinking water might be combined with the dose received from contact with the same contaminant in fish.

For many chemicals, much information is available on how the individual chemical produces effects. However, it is much more difficult to assess exposure to multiple chemicals. Due to the large number of chemicals in the environment, it is impossible to measure all of the possible interactions between these chemicals. The potential exists for these chemicals to interact in the body and increase or decrease the potential for adverse health effects. Individual cancer risk estimates can be added since they are measures of probability. However, when estimating non-cancer risk, similarities must exist between the chemicals if the doses are to be added. Groups of chemicals that have similar toxic effects can be added, such as volatile organic compounds (VOCs) which cause liver toxicity. Polycyclic aromatic hydrocarbons (PAHs) are another group of compounds that can be assessed as one combined dose based on similarities in chemical structure and metabolites.

portion of heavy metals. Bottom fish species should be analyzed without the gut and large clams should be analyzed without skin and without the gut for human health purposes.

The amount and type of chemical in contaminated media is another source of uncertainty. Environmental samples are very costly; so it is not practical or efficient to analyze an adequate number of samples for every existing chemical. Instead, sampling usually focuses on contaminants that are thought to be present based on historic land use or knowledge of specific chemical spills.

Fish Meal Limits

Several contaminants of concern are present in seafood from Fidalgo Bay. Meal limits were calculated using the RfD/MRL as the target risk value and the exposure parameters provided in Appendix E, Table E1.

Many factors must be considered when one is recommending limits on the consumption of seafood including the health benefits of eating fish, the quality and comprehensiveness of environmental data, and the availability of alternate sources of nutrition. In addition, these limits do not consider that multiple species are consumed, a consideration that would require weighting the percent of each species consumed.

Children's Health Concerns

The potential for exposure and subsequent adverse health effects often increases for younger children compared with older children or adults. ATSDR and DOH recognize that children are susceptible to developmental toxicity that can occur at levels much lower than those causing other types of toxicity. The following factors contribute to this vulnerability:

- Children are more likely to play outdoors in contaminated areas by disregarding signs and wandering onto restricted locations.
- Children often bring food into contaminated areas, resulting in hand-to-mouth activities.
- Children are smaller and receive higher doses of contaminant exposures per body weight.
- Children are shorter than adults; therefore, they have a higher possibility of breathing in dust and soil.
- Fetal and child exposure to contaminants can cause permanent damage during critical growth stages.

These unique vulnerabilities of infants and children demand special attention in communities that have contaminated water, food, soil, or air. Children's health was considered in the writing of this health consultation and the exposure scenarios treated children as the most sensitive population being exposed.

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Figure 2. Red box indicates the Fidalgo Bay site location, Skagit County, Washington.



Appendix A

This section provides calculated exposure doses and assumptions used for exposure to chemicals in sediments at the Fidalgo Bay site. Three different exposure scenarios were developed to model exposures that might occur. These scenarios were devised to represent exposures to a child (0-5 yrs), an older child, and an adult. The following exposure parameters and dose equations were used to estimate exposure doses from direct contact with chemicals in sediments.

Exposure to chemicals in soil via ingestion, inhalation, and dermal absorption.

Total dose_(non-cancer) = Ingested dose + inhaled dose + dermally absorbed dose

Ingestion Route

$$\text{Dose}_{(\text{non-cancer (mg/kg-day)})} = \frac{C \times CF \times IR \times EF \times ED}{BW \times AT_{\text{non-cancer}}}$$

$$\text{Cancer Risk} = \frac{C \times CF \times IR \times EF \times CPF \times ED}{BW \times AT_{\text{cancer}}}$$

Dermal Route

$$\text{Dermal Transfer (DT)} = \frac{C \times AF \times ABS \times AD \times CF}{ORAF}$$

$$\text{Dose}_{(\text{non-cancer (mg/kg-day)})} = \frac{DT \times SA \times EF \times ED}{BW \times AT_{\text{non-cancer}}}$$

$$\text{Cancer Risk} = \frac{DT \times SA \times EF \times CPF \times ED}{BW \times AT_{\text{cancer}}}$$

Inhalation Route

$$\text{Dose}_{\text{non-cancer (mg/kg-day)}} = \frac{C \times SMF \times IHR \times EF \times ED \times 1/PEF}{BW \times AT_{\text{non-cancer}}}$$

$$\text{Cancer Risk} = \frac{C \times SMF \times IHR \times EF \times ED \times CPF \times 1/PEF}{BW \times AT_{\text{cancer}}}$$

Fidalgo Bay Sediment Exposure Route – Non-cancer

Table A2. Non-cancer hazard calculations resulting from exposure to cPAHs in sediments from Fidalgo Bay, Anacortes, WA.

Contaminant	TEQ Concentration (ppm) (mg/kg)	Scenarios	Estimated Dose (mg/kg/day)			Total Dose	LOAEL (mg/kg/day)	Total Dose/ LOAEL
			Incidental Ingestion of Soil	Dermal Contact with Soil	Inhalation of Particulates			
cPAH	0.102	Child	1.94E-7	7.30E-8	1.34E-11	2.67E-7	1.0E+1	0.00000003
		Older Child	3.54E-8	2.67E-8	8.28E-12	6.22E-8		0.000000006
		Adult	2.02E-8	1.05E-8	5.12E-12	3.07E-8		0.000000003

Fidalgo Bay Sediment Exposure Route – Cancer

Table A3. Cancer hazard calculations resulting from exposure to cPAHs sediments from Fidalgo Bay, Anacortes, WA.

Contaminant	Concentration (ppm)	EPA cancer Group	Cancer Potency Factor (mg/kg-day ⁻¹)	Scenarios	Increased Cancer Risk			Total Cancer Risk
					Incidental Ingestion of Soil	Dermal Contact with Soil	Inhalation of Particulates	
Total cPAH TEQ	0.102	B2	7.3	Child	9.43E-8	3.55E-8	6.53E-12	1.30E-7
				Older Child	3.45E-8	2.60E-8	8.06E-12	6.05E-8
				Adult	2.95E-8	1.53E-8	7.47E-12	4.48E-8

Lifetime cancer risk: $1.30\text{E-}7 + 6.05\text{E-}8 + 4.48\text{E-}8 = 2.35\text{E-}7$

Table B2. Derivation of a child's shellfish consumption rate for the general U.S. population.

Row	Parameter	Adult	Older Child (6-17 yrs)	Child (0-6 yrs)
1	Reported All Fish Consumption Rate- gram fish per kg bodyweight per day (g/kg/day)	0.277	0.225	0.433
2	Ratio to Adult All Fish Consumption Rate	1	0.81	1.6
3	Reported Shellfish Consumption (g/day)	1.70 (average)	Not Reported	Not Reported
4	Average Body Weight (kg)	70	41	15
5	Ratio to Adult BW	1	0.59	0.21
6	Adjusted Shellfish Consumption Rates (g/day) = Row 2 x Row 3 x Row 5	1.70 (average)	0.81 (average)	0.57 (average)

Table B3. Derivation of bottom consumption rate for the general U.S. population based on four percent of total fish intake.

Row	Parameter	Adult	Older Child (6-17 yrs)	Child (0-6 yrs)
1	Reported All Fish Consumption Rate- (g/day)	17.5	9.0	7.0
2	Assume bottom fish intake rate similar to tribal at about 4 percent [15]	0.04	0.04	0.04
3	Adjusted bottom fish rates (g/day) = Row 1 x Row 2	0.70	0.36	0.28

Table B5. Cancer risk from ingesting seafood at the average concentrations of contaminants in bottom fish, clams and crab samples taken from Fidalgo Bay, in Anacortes, Washington.

Species	Contaminant	Average Concentration (ppm)	Cancer Potency Factor (mg/kg-day ⁻¹)		Increased Cancer Risk General population Average	Total Cancer Risk General population Average
Clams	Arsenic	0.027	5.7	Child	5.01E-7	1.53E-5
Crabs				Older child	4.34E-7	
				Adult	1.60E-6	
		Child		1.32E-6		
		Older child		1.14E-6		
		Adult		4.21E-6		
		Bottom Fish		0.15	Child	
Older child		1.07E-6				
Adult		3.66E-6				
Clams	Dioxin	7.99E-8	1.5E+5	Child	3.90E-8	5.82E-7
Crabs				Older child	3.38E-8	
				Adult	1.25E-7	
		Child		4.76E-8		
		Older child		4.13E-8		
		Adult		1.52E-7		
		Bottom Fish		1.34E-7	Child	
Older child		2.52E-8				
Adult		8.61E-8				
Sum of cancer risk						1.59E-5

Table C1. Fidalgo Bay arsenic intake rate based on the Tulalip Tribe seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related concentration of arsenic, mg/kg in tissue	Category Specific Exposure mg/kg-day
194	Salmon	49.7	0	0
194	Pelagic Fish	4.2	0	0
194	Bottom Fish	3.9	0.15	0.0000139
194	Shellfish*	42.2	0.049	0.0000490
Sum, IR _{total}				0.0000629

*Crabs tissues and clams average

Arsenic Estimated hazard index = 0.21

Arsenic Estimated cancer risk = 3.59E-4

Table C2. Fidalgo Bay cadmium intake rate based on the Tulalip Tribe seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related concentration of cadmium, mg/kg in tissue	Category Specific Exposure mg/kg-day
194	Salmon	49.7	0	0
194	Pelagic Fish	4.2	0	0
194	Bottom Fish	3.9	0	0
194	Shellfish*	42.2	0.48	0.00048
Sum, IR _{total}				0.00048

*Crabs tissues only average

Cadmium Estimated hazard index = 0.3

Table C5. Fidalgo Bay mercury intake rate based on the Tulalip Tribe seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related concentration of mercury, mg/kg in tissue	Category Specific Exposure mg/kg-day
194	Salmon	49.7	0	0
194	Pelagic Fish	4.2	0	0
194	Bottom Fish	3.9	0.042	0.00000388
194	Shellfish*	42.2	0.049	0.000049
Sum, IR _{total}				0.0000529

*Crabs tissues only average

Mercury Estimated hazard index = 0.53

Table C6. Fidalgo Bay arsenic intake rate based on Suquamish Tribe seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related concentration of arsenic, mg/kg in tissue	Category Specific Exposure mg/kg-day
766.8	Salmon	23.9	0	0
766.8	Pelagic Fish	7.3	0	0
766.8	Bottom Fish	3.8	0.15	0.000553
766.8	Shellfish*	65	0.049	0.000309
Sum, IR _{total}				0.000364

*Crabs tissues and clams average

Arsenic Estimated hazard index = 1.2

Arsenic Estimated cancer risk = 2.1E-3

Table C7. Fidalgo Bay cadmium intake rate based on Suquamish Tribe seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related concentration of cadmium, mg/kg in tissue	Category Specific Exposure mg/kg-day
766.8	Salmon	23.9	0	0
766.8	Pelagic Fish	7.3	0	0
766.8	Bottom Fish	3.8	0	0
766.8	Shellfish*	65	0.48	0.003
Sum, IR _{total}				0.003

*Crabs tissues only average

Cadmium Estimated hazard index = 3

Table C10. Fidalgo Bay mercury intake rate based on Suquamish Tribe seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related concentration of mercury, mg/kg in tissue	Category Specific Exposure mg/kg-day
766.8	Salmon	23.9	0	0
766.8	Pelagic Fish	7.3	0	0
766.8	Bottom Fish	3.8	0.042	0.0000155
766.8	Shellfish*	65	0.049	0.000309
Sum, IR _{total}				0.00032

*Crabs tissues only average

Mercury Estimated hazard index = 3.2

The IEUBK model assumes that a child's total meat intake is 93.5 g/day. EPA's target cleanup goal is no more than 5% of the community with BLLs above 10 µg/dL. Default assumptions were used unless noted.

Percent of consumption rates represented by category were obtained by using the mean because the 90th percentile did not add up to the total intake of seafood. However, the overall consumption rate was based on the 90th percentile consumers only.

Consumption rates: Tulalip Tribe child – shellfish (5.8 g/day) and bottom fish (0.14 g/day).

Table D2. Fidalgo Bay lead intake rate based on Tulalip Tribe child seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related Consumption Rate, g/day
11.07	Salmon	28.4	0
11.07	Pelagic Fish	18	0
11.07	Bottom Fish	1.3	0.14
11.07	Shellfish*	52.3	5.8

*Crabs tissues and clams average

Table D3. Blood lead values determine using the IEUBK model for lead in seafood from Fidalgo Bay, Anacortes, Washington.

Seafood	Average Concentration (ppm)	Percent meat intake as shellfish (%)	Blood Lead level in percent above 10ug/dl Age range 0 - 84 months
Shellfish*	1.21	6.2	4.26
Bottom fish	1.29	0.15	1.25
Average Blood Lead level in percent above 10ug/dl; Age range 0 - 84 months			2.76

PPM – parts per million

*Crabs tissues and clams average

Lead exposure shellfish ingestion scenario used in the Adult lead model

This section provides inputs for the Adult lead model.

EPA's target cleanup goal is no more than 5% of the community with BLLs above 10 µg/dL.

Default assumptions were used unless noted.

Table D6. Blood lead values determined using the Adult lead model for lead in seafood from Fidalgo Bay, Anacortes, Washington.

Seafood	Average Concentration (ppm)	Mother's blood lead concentration in ug/dl 95 th percentile fetal blood lead in ug/dl	
Shellfish	1.21*	mother	1.9
		fetus	4.8
Bottom fish	1.29	mother	1.5
		fetus	4.6
Average mother's blood lead concentration in ug/dl		1.9	
Average 95 th percentile fetal blood lead in ug/dl		4.7	

PPM – parts per million

*Crabs tissues and clams average

Table D9. Fidalgo Bay lead intake rate based on the Suquamish Tribe Adult seafood consumption rate Anacortes, Washington.

Overall Fish/Shellfish Consumption Rate, g/day	Category	Percent of Consumption Rate Represented by Category	Site-related Consumption Rate, g/day
766.8	Salmon	23.9	0
766.8	Pelagic Fish	7.3	0
766.8	Bottom Fish	3.8	29.14
766.8	Shellfish*	65	498.42

*Crabs tissues and clams average

Table D10. Blood lead values determined using the Adult lead model for lead in seafood from Fidalgo Bay, Anacortes, Washington.

Seafood	Average Concentration (ppm)	Mother's blood lead concentration in ug/dl 95 th percentile fetal blood lead in ug/dl	
Shellfish	1.21*	mother	30.4
		fetus	92.7
Bottom fish	1.29	mother	3.3
		fetus	10.0
Average mother's blood lead concentration in ug/dl		16.9	
Average 95 th percentile fetal blood lead in ug/dl		51.4	

PPM – parts per million

*Crabs tissues and clams average

Table E2. Calculated meal limits per month for clams from Fidalgo Bay in Anacortes, Washington.

Contamination	Concentration (ppm)	Meals based on RfD/ MRL	Lowest meals per month (rounded to single digit)
Arsenic	0.027	89.3	13
Chromium	1.84	13.1	
Dioxin	7.99E-8	100.6	

Table E3. Calculated meal limits per month for Crabs from Fidalgo Bay in Anacortes, Washington.

Contamination	Concentration (ppm)	Meals based on RfD/ MRL	Meals based on Developmental additive endpoint	Meals based on Immune additive endpoint	Lowest meals per month (rounded to single digit)
Arsenic	0.071	33.9	13.747.8		14
Cadmium	0.48	16.7			
Dioxin	9.75E-8	82.4			
Mercury	0.049	16.4			

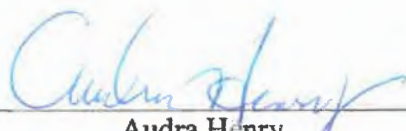
Table E4. Calculated meal limits per month for Bottom Fish from Fidalgo Bay in Anacortes, Washington.

Contamination	Concentration (ppm)	Meals based on RfD/ MRL	Meals based on Developmental additive endpoint	Meals based on Immune additive endpoint	Lowest meals per month (rounded to single digit)
Arsenic	0.15	16.1	14.5	54.8	14
Dioxin	1.34E-7	60.0			
Mercury	0.042	19.1			

Applying the Table E2, E3 and E4 meal limits across the general population assumes that meal size will decrease or increase proportionately with body weight. Such an assumption could result in underestimating exposure for consumers who eat proportionately more fish per unit of body weight. Table E5 demonstrates how an eight-ounce meal for a 70-kilogram adult would change to remain proportional with body weight.

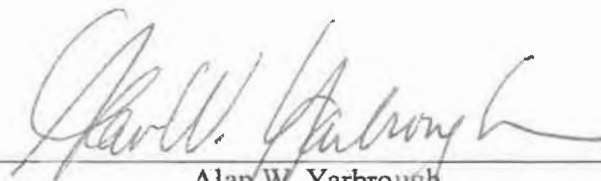
Certification

The Washington State Department of Health prepared this Health Consultation under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). It was completed in accordance with approved methodology and procedures existing at the time the health consultation was initiated. Editorial review was completed by the Cooperative Agreement partner.



Audra Henry
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The Division of Health Assessment and Consultation, ATSDR, has reviewed this public health consultation and concurs with the findings.



Alan W. Yarbrough
Team Lead, CAPEB, DHAC
Agency for Toxic Substances & Disease Registry

*For the Record
Tesoro Hearing Nov 2
2017
Afternoon testimony*

Evaluating the Need for Pipelines: A False Narrative for the Canadian Economy

Jeff Rubin

READ OUT LOUD

Key Points

- The claim that additional pipeline capacity to tidewater will unlock significantly higher prices for bitumen is not corroborated by either past or current market conditions.
- Recent international commitments to reduce global carbon emissions over the next three decades will significantly reduce the size of future oil markets. Only the lowest-cost producers will remain commercially viable while high-cost producers will be forced to exit the market.
- The National Energy Board should consider a rapidly decarbonizing global economy when assessing the need and commercial viability of further pipelines in the country and use Western Canadian Select (WCS) as the price benchmark when evaluating the economic viability of any new oil sands projects. Pension plans need to stress test their long-term investments in the oil sands in the context of a decarbonizing global economy.

Introduction

Canadians continue to be told that new pipelines are key for Canada's economic future, even as the government, like most around the world, has committed the country to unprecedented cuts in carbon emissions over the next several decades. At stake is the future of the oil sands, whose spectacular growth on the back of triple-digit oil prices was once seen as the principal engine of national economic growth. But in the aftermath of a global supply glut that has more than halved world oil prices, oil sands stocks have suffered a massive loss in value, prompting a steady exodus of global energy giants from the sector. In view of these developments, do new pipelines make much commercial sense in the context of today's oil market, and will they make any more sense in the context of tomorrow's emission-constrained market?

Does Access to Offshore Markets Really Provide Higher Prices for Oil Sands Bitumen?

The oil sands industry has argued that not only are pipelines vital for future production growth, but the access they would provide to tidewater, and hence overseas markets, would unlock significant pricing power currently denied to

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Jeff Rubin is a CIGI senior fellow. A Canadian economist and bestselling author, Jeff is a world-leading energy expert and former chief economist and chief strategist at CIBC World Markets.

Jeff is currently researching the implications of shifting US trade, energy and environmental policies on the Canadian economy under the Trump administration, including a critical assessment of how Canada's auto industry has performed relative to its NAFTA trading partners, an exploration of whether globalization has left Canadian workers behind and an examination of whether shifts in US energy and environmental policies will have a discernible impact on the future of Canada's fossil fuel industries.

Jeff began his career in 1982 at the Ontario Ministry of Treasury and Economics. In 1991, he was appointed chief economist and managing director at the investment bank CIBC World Markets. In 2007, Jeff was appointed the firm's chief equity strategist in addition to his responsibilities as chief economist.

Jeff resigned from CIBC World Markets in 2009 to pursue a career as an author. His first book, *Why Your World Is About to Get a Whole Lot Smaller*, was an international bestseller, and was favourably reviewed in both *Time* and *Newsweek*. The book was the number-one-selling non-fiction book in Canada and won the National Business Book Award, as well as being long-listed for the Financial Times and Goldman Sachs Business Book of the Year Award. Since then, he has written two other bestsellers, *The End of Growth* and *The Carbon Bubble*.

the landlocked resource. It is even often claimed that if Alberta's bitumen could reach distant offshore markets in Asia and Europe, it would fetch world oil prices, a threshold the fuel typically trades anywhere from 20 to 30 percent below.

While that narrative is commonplace in the country's business media, bitumen is not conventional oil, and nowhere in the world does it command the same price. It is an inferior crude with high sulphur content that must first be upgraded before most refineries can use it as a feedstock. It is the physical properties of bitumen, not the location where it is sold, that dictates a price discount to conventional light oil such as West Texas Intermediate (the US oil price benchmark) or Brent (the world oil price benchmark).

Market location does, however, affect the size of the price discount at which bitumen trades in relation to conventional oil, but in a manner very different than what the oil sands industry claims. While market diversification is, in principle, a laudable pursuit, in the case of Alberta's bitumen it would result in even lower prices than oil sands producers currently get in their one and only North American market.

In fact, WCS, the benchmark price for oil sands product in the North American market, offers higher prices for bitumen than elsewhere in the world due to the concentration of heavy oil refineries along the US Gulf Coast. These refineries are also configured to receive a similar type of supply from Mexico and Venezuela.

Comparable grades of heavy oil, such as Mexican Maya crude, typically trade at more than US\$8 a barrel less, not more, in Asian markets compared to the prices Gulf Coast refineries pay. Similarly, in Europe, Mexican Maya typically trades at more than US\$3 per barrel lower than it does on the US Gulf Coast (Rubin 2016b, 7). The offshore markets that would be accessed through new pipelines to tidewater would fetch even lower prices than the money-losing prices the oil sands producers already receive in North America, an outcome that is far from serving as the desperately needed saviour that would enhance pricing power and unlock billions of dollars of additional revenues.

So why build new pipelines to supply offshore markets that are even less favourable than those found in North America? In the industry's mind, pipelines provide "optionality." In other

words, they provide the industry with the option to access new markets in the future when, presumably, higher prices will render new oil sands production profitable. And those offshore markets, however unfavourable from today's pricing standpoint, are now viewed by the industry as more likely to support future production growth than the US market.

While close proximity to the United States, the world's largest oil market, once spurred the rapid expansion of oil sands production, today that is no longer the case. With the advent of much cheaper oil from prolific shale formations such as the Permian Basin in Texas, oil sands producers now see few, if any, growth prospects in the market that they were originally intended to serve.

But in a global market still mired in a seemingly endless supply glut, demand for Alberta's bitumen in no greater abroad than it is in the United States. Even with the aid of the deepest cutbacks in Organization of the Petroleum Exporting Countries (OPEC) production since the Great Recession, oil prices languish at levels less than half of the triple-digit thresholds that once drove the massive development of the oil sands. Instead of opening up market space for more heavy oil production from Canada, OPEC's retrenchment has instead spurred production of lower cost and higher quality light oil from US shale formations.

US Shale Producers Have Been Biggest Beneficiaries of OPEC Production Cuts

As nimbler shale producers in the United States — with much shorter lead times and much smaller start-up costs — have ramped up production, oil sands producers have received little, if any, benefit from the cutbacks in OPEC production. While the sector will continue to see some production growth from the completion of ongoing projects,¹ none

would be initiated in today's market environment. Indeed no greenfield projects could be considered in light of the current trading range of WCS, which is in the US\$30-US\$40 a barrel range, roughly half the cost of new oil sands projects.²

Similarly, the explosive growth of US shale gas production will adversely impact Canadian natural gas exports and the pipelines that currently carry the fuel to US markets. According to the US Energy Information Administration, expected production growth from the Marcellus and Utica shale gas formations will gradually displace pipeline imports from Canada (McCarthy 2017b).

The faltering economics of oil sands production has led to a steady exodus of international energy giants that have sold their oil sands assets and are exiting the sector in favour of much lower cost alternatives around the world, in particular shale properties in Texas. Shell sold its US\$8.5-billion stake in the Athabasca oil sands mining project to Canadian Natural Resources (Lewis and McCarthy 2017). Similarly, Conoco Phillips sold its oil sands assets to Canadian-based Cenovus (Lewis, Jones and Cryderman 2017). Both BP and Chevron are also abandoning the resource, with the former selling its 50 percent share in the Sunrise project and the latter intending to sell its 20 percent share in the Athabasca oil sands operation (Tilak and Williams 2017).

Those that remain have had to take massive writedowns on their oil sands assets. Exxon had to write off US\$16 billion of its oil sands assets, including all 3.5 billion barrels of bitumen reserves at its massive and still expanding Kearl Lake mine (Smith 2017). Following the huge decline in oil prices since 2014, Exxon's high-cost oil sands resource no longer meets the US Securities Exchange Commission's definition of a proven reserve, which is one that can be commercially exploited at today's prices with current technology. Having already spent billions of dollars to develop the mine, Exxon and its Canadian subsidiary, Imperial Oil, have little choice but to complete the ongoing expansion, whose increased output only adds to the current glut of oil already weighing on the price of WCS.

1 Most notably the opening of the Suncor-led Fort Hills mine, although the French oil giant Total has suspended further funding and is reportedly trying to sell its interest in the project (Lewis 2017), and the Horizon Phase 3 project by Canadian Natural Resources. Together, the two projects could add more than 200,000 barrels per day (bpd) of heavy oil to an already saturated market.

2 For a description of the costs of new oil sands projects, see Rubin (2016a).

It may seem curious that just as so many major global oil firms are exiting the oil sands, or being forced to write down the value of their assets there, regulatory approval has been given on both sides of the border for new pipelines to service the troubled sector. In Canada, the Trudeau government has given its approval for a twinning of Kinder Morgan's existing Trans Mountain pipeline that would almost triple the amount of oil flowing to its terminus in Burnaby, British Columbia, and result in a seven-fold increase in tanker traffic in Vancouver Harbour to transport it. In addition, the Trudeau government has already approved the replacement of Enbridge's Line 3 pipeline that will double the throughput of the replaced line to 760,000 bpd (Bell 2017). Across the border, President Donald Trump has made good on his election campaign promise to finally approve TransCanada's Keystone XL pipeline, reversing an earlier rejection of the project by his predecessor, President Barack Obama, on climate change grounds.

But regulatory approvals, even elusive ones at the US presidential level, are no substitute for viable economics. At current prices for WCS, the greenfield projects that would be needed to supply new pipelines could not be financed in today's weak oil markets.

TransCanada admitted as much when it announced it was having trouble lining up shipper agreements (long-term supply contracts) for its long-delayed Keystone XL pipeline project, which is intended to move 830,000 bpd (McCarthy 2017a). Meanwhile, the incoming New Democratic Party government in British Columbia, in coalition with the Green Party, has withdrawn the province's earlier support for the twinning of Kinder Morgan's TransMountain pipeline and has vowed to do everything in its power to prevent it should the pipeline twinning succeed against court challenges.

Global Efforts to Mitigate Climate Change Pose Even Greater Challenges to the Oil Sands in the Future

Notwithstanding today's many hurdles, the industry has pitched investors on the notion that the economic lifetimes of new pipelines and the oil sands operations that would supply them are long term, spanning the course of decades. While current market conditions may not justify new pipelines, oil sands producers claim the course of future conditions will. Inevitable growth in global oil demand will ultimately raise oil prices sufficiently to justify a future expansion of oil sands production, all the more so following the recent cutbacks worldwide in the oil industry on capital expenditures to find and develop new reserves. But more and more investors, as evidenced by the plunging valuations of oil sands stocks as well as those of other fossil fuel producers, are finding this a hard argument to buy into, in light of global commitments to reduce carbon emissions.

Instead, investors are increasingly recognizing that global efforts to mitigate climate change compel urgent and unprecedented reductions in fossil fuel consumption.

Even the previous international target of capping the increase in average global temperature to 2°C required that global oil demand peak by the end of this decade and subsequently fall by one-quarter over the next two and a half decades. The newer, more stringent target of holding the temperature rise to less than the 2°C threshold (adopted at the twenty-first session of the Conference of the Parties [COP21] in Paris in 2015) requires world oil consumption to fall by as much as 50 percent by midcentury.

Most of the expected decline in oil consumption will come as a result of its phaseout and ultimate replacement as a transit fuel, which currently accounts for more than two-thirds of the fuel's worldwide usage. The United Kingdom, France and Norway have already declared that by 2040 they will ban the sale of gasoline- and diesel-

powered automobiles, setting a marker that other countries are likely to emulate. These moves follow China, home to the world's largest vehicle market, deciding that by 2025 one-quarter of all vehicles on its roads must be either electric or hybrid (Castle 2017; Schwartz and Jourdan 2017). Anticipating such moves, auto manufacturer Volvo has said that the company will cease producing fossil-fuel-powered cars after 2019, while virtually every major vehicle manufacturer has made the development of electric-powered cars their key priority.

Yet those are precisely the time frames during which oil sands producers and pipeline companies expect oil sands production to grow rapidly, providing the critical economic rationale for new pipelines to be built. Instead of benefiting from another three decades of business-as-usual growth, where world oil demand can reliably be counted on to grow at least one percent a year, oil sands producers can expect to be operating in a sharply contracting global market that would shut down as much as half of today's nearly 97 million bpd of production.

Conclusion and Policy Recommendations

In the emission-constrained world around the corner, only the lowest-cost producers will remain viable and they will come to dominate the global oil market like never before. With production costs as low as US\$10 a barrel in Saudi Arabia and neighbouring countries, most of the world's future oil production will come from OPEC producers in the Middle East. While today OPEC is curtailing its own production in a temporary attempt to buttress oil prices, in tomorrow's rapidly decarbonizing global economy the onus of adjustment to a steadily shrinking oil market will ultimately fall squarely on the shoulders of the world's highest-cost producers. It is the marginal supplier, not the low-cost supplier, who will have to bear the brunt of future production cutbacks mandated by global efforts to mitigate climate change.

Hence, global compliance with climate mitigation targets poses a lethal outlook for the future of the oil sands, as it does to other high-cost supply sources such as Arctic oil, and even a good portion of US shale production. Not only will the reduction

in world oil demand needed to hold the increase in global temperature to less than 2°C obviate the need for any new pipelines, but much of Canada's existing pipeline capacity will become redundant in the face of what can only be a massive contraction in oil sands production over the next three decades.

Policy Recommendation 1: The National Energy Board should consider a rapidly decarbonizing global economy, consistent with the international commitments made at COP21 to limit future carbon emissions, as the base case when modelling future global oil demand and assessing the commercial viability of new pipelines and any required increase in oil sands production to fill them.

Policy Recommendation 2: In assessing new pipeline proposals, the National Energy Board should use WCS as the price benchmark when evaluating whether market conditions provide sufficient economic returns to justify any new oil sands projects and not price benchmarks for conventional oil such as West Texas Intermediate or Brent, which trade at a considerable premium to bitumen. Moreover, the National Energy Board should recognize that overseas markets that could be reached through new pipelines to tidewater (such as the approved twinning of the TransMountain pipeline, whose terminus is in Burnaby, British Columbia) will bring oil sands producers lower, not higher, prices for their bitumen than they already receive in the North American market.

Policy Recommendation 3: Pension plans need to stress test their long-term investments in the oil sands, along with those made in other fossil fuel industries and associated infrastructure, against expected declines in global consumption of these fuels and their expected impact on future fuel prices. With the oil and gas sector accounting for roughly one-fifth of the market capitalization of the TSX Composite, the sector can be expected to continue to exert a major drag on the overall performance of Canadian equity markets, resulting in lower rates of return from pension plans than would otherwise be the case. The federal and provincial governments should consider ordering pension plans that fall under their jurisdiction to divest from the sector in order to immunize their portfolios from the growing risk of further losses in the valuation of fossil fuel stocks, and, in particular, those connected with the high-cost oil sands.

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